

## Re: Draft of memo

DANIEL KIRK (States Attorney)

Wed 5/4/2016 5:47 PM

To: WALTER HEHNER (States Attorney) <walter.hehner@cookcountyl.gov>;

Cc: JOSEPH MAGATS (States Attorney) <joseph.magats@cookcountyl.gov>; FABIO VALENTINI (States Attorney) <fabio.valentini@cookcountyl.gov>;

Yes. Looks good.

Sent from my iPhone

On May 4, 2016, at 5:41 PM, WALTER HEHNER (States Attorney) <[walter.hehner@cookcountyl.gov](mailto:walter.hehner@cookcountyl.gov)> wrote:

All:

This looks sufficient to me. Nice job.

Walt

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**From:** JOSEPH MAGATS (States Attorney)

**Sent:** Wednesday, May 4, 2016 4:40 PM

**To:** DANIEL KIRK (States Attorney); WALTER HEHNER (States Attorney); FABIO VALENTINI (States Attorney)

**Subject:** Draft of memo

Attached is a draft of a memo to the ASAs regarding situations where it is unclear whether a judge's findings rise to the level of Giglio type of material and need to be disclosed. Please let me know whether there are any changes that you wish to have made. Once everyone has approved it, I will send it out.

Joe Magats, ASA

Deputy Chief, Criminal Prosecutions Bureau

2650 S. California Ave, 11D40

Chicago, IL 60608

Phone: 773-674-2721/2722

Email: [joseph.magats@cookcountyl.gov](mailto:joseph.magats@cookcountyl.gov)

Fax: 773-674-2382



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Giglio material regarding Chicago Police Officer Wahbe Askar, Star# 8156

Date: May 4, 2016

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrsoe, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous, Acting Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

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On August 5, 2015 The Honorable Judge Joseph Claps, in the case of The People of The State of Illinois v. Steven Brown, 14CR-17730, made findings regarding the credibility of Chicago Police Officer Wahbe Askar, Star# 8156 that may impact his credibility should he testify in court in the future. A copy of Judge Claps' findings is attached to this memo

Pursuant to Brady v. Maryland, 373 US 83 (1963), the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. Giglio v. United States, 405 U.S. 150, 154 (1972). Judge Claps' findings regarding Officer Askar's testimony could potentially be found to be the type of information required to be disclosed under Giglio.

Given this possibility, if you or any of the assistants that you supervise have a case where Officer Askar is listed as a potential witness on our answer to discovery, Judge Claps' finding is to be disclosed to the defense prior to trial. The MIS Department is doing a computer search to determine whether Officer Askar is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS and have another list run. In addition, MIS has been instructed to flag Officer Askar's name in CRIMES to alert ASAs that a notice of disclosure is required in the case. Units that do not have a computer case management system will have to check their files to determine whether Officer Askar is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Askar is listed as a witness, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your knowledge. An electronic copy of the notice will be sent to you.

Also please remind your ASAs that the mere fact that this possible Giglio material is discoverable and has been tendered to the defense does not in and of itself mean that the defense can introduce the evidence at trial or cross-examine Officer Askar regarding the material. The ASAs should, in the appropriate cases, file all necessary motions to seek a judicial determination as to whether this information is Giglio material and, if so, whether the material is relevant and admissible at any trial or hearing where Officer Askar is going to be called as a witness.

In general, the case law in this area is, of course, set out in United States v. Brady, 373 U.S. 83 (1963) and Giglio v. United States, 405 U.S. 150 (1972). The timing of disclosure is governed by Weatherford v. Bursey, 429 U.S. 545 (1977). What needs to be disclosed is discussed in United States v. Agurs, 427 U.S. 97 (1976); United States v. Diaz, 922 F.2d (2<sup>nd</sup> Cir. 1990); United States v. Veras, 51 F.3d 1365 (7<sup>th</sup> Cir. 1995) and United States v. Kiszewski, 877 F.2d 210 (2<sup>nd</sup> Cir. 1989). Limiting the use of this type of information is discussed in People v. Driskell, 213 Ill.App.3d 196 (4<sup>th</sup> Dist. 1991) and People v. Fonza, 217 Ill.App.3d 883, 892 (1st Dist. 1991).



OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Wing Commanders

Robert Heilingoetter, ASA  
Supervisor, Second Municipal District

John Dillon, ASA  
Supervisor, Preliminary Hearing/Grand Jury Unit

Maria Burnett, ASA  
Supervisor, First Municipal District

Peter Goutos, ASA  
Supervisor, Traffic Division

Alzetta Bozeman-Martin, ASA  
Supervisor, Domestic Violence Division

From: Joe Magats, ASA  
Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Officer Richard Fiorito, Star# 11624, 23<sup>rd</sup> District

Date: November 4, 2009

Cc: Shauna Boliker, ASA  
Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA  
Chief, Special Prosecutions Bureau

Mercedes Luque-Rosales, ASA  
Chief, Narcotics Prosecutions Bureau

Tisa Morris, ASA  
Chief, Juvenile Justice Bureau

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Please have your ASAs check their files and see whether they have any cases on their call where Chicago Police Officer Richard Fiorito, Star# 11624, 23<sup>rd</sup> District is a witness. If he is a witness on the case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Fiorito's testimony you should proceed on the case.

If you have a case where we cannot proceed without Officer Fiorito's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please let me or Shauna know prior to taking any action. Also have your ASAs keep track of how many Fiorito cases they have and how many of those cases were dismissed.

Additionally, please do not subpoena or notify Officer Fiorito to come to court. If he does appear pursuant to a previously issued subpoena or notification that we issued, please release him.

If you or your ASAs have any questions, please call me. Thank you.



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: Fabio Valentini, ASA  
Supervisor, Felony Review Unit

All Wing Commanders

Robert Heilingoetter, ASA  
Supervisor, Second Municipal District

Peter J. Troy, ASA  
Supervisor, Fifth Municipal District

John Dillon, ASA  
Supervisor, Preliminary Hearings/Grand Jury Unit

Alzetta Bozeman-Martin, ASA  
Supervisor, Domestic Violence Division

Peter Goutos, ASA  
Supervisor, Traffic Division

Maria Burnett, ASA  
Supervisor, First Municipal Division

From: Joe Magats, ASA  
Deputy Chief, Criminal Prosecutions Bureau

Re: Sgt. John Pallohusky, Star #2612, Area Four Violent Crimes

Date: November 20, 2009

Cc: Anita Alvarez  
State's Attorney of Cook County

Adrienne Mebane

First Assistant

Walt Hehner  
Chief Deputy

Daniel Kirk  
Chief of Staff

Shauna Boliker, ASA  
Chief, Criminal Prosecutions Bureau

Mercedes Luque-Rosales, ASA  
Chief, Narcotics Prosecution Bureau

Tisa Morris, ASA  
Chief, Juvenile Justice Bureau

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Our office has charged Sgt. John Pallohusky, Star #2612, Area Four Violent Crimes, with Theft of over \$100,000. Please have you and the assistants that you supervise check your files to determine whether they or your unit have any cases where Sgt. Pallohusky is a witness. If you do, please send me a list of the cases, including the defendant's name, case number, charges, next date, and whether Sgt. Pallohusky is necessary witness. If you or your unit do not have any such cases please let me know that as well. Thank you.



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COOK COUNTY, ILLINOIS**

**ANITA ALVAREZ  
STATE'S ATTORNEY**

**CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608**

**To:** All Wing Commanders  
  
Robert Heilingoetter, ASA, Supervisor, Second Municipal District  
  
Peter J. Troy, ASA, Supervisor, Fifth Municipal District  
  
John Dillon, ASA, Supervisor, Preliminary Hearing/Grand Jury Unit  
  
Maria Burnett, ASA, Supervisor, First Municipal District  
  
Peter Goutos, ASA, Supervisor, Traffic Division  
  
Alzetta Bozeman-Martin, ASA, Supervisor, Domestic Violence Division

**From:** Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

**Re:** Chicago Police Officer Victor Brown, Star# 6098

**Date:** May 11, 2010

**Cc:** Adrienne Mebane, First Assistant  
  
Walt Hehner, Chief Deputy  
  
Dan Kirk, Chief of Staff  
  
Shauna Boliker, ASA, Chief, Criminal Prosecutions Bureau  
  
Jack Blakey, ASA, Chief, Special Prosecutions Bureau  
  
Tisa Morris, ASA, Chief, Juvenile Justice Bureau  
  
Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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As you may already know, Chicago Police Officer Victor Brown, Star# 6098 was charged



federally with making false statements to the FBI. Please have your ASAs check their files and see whether they have any cases on their call where Officer Brown is a witness. If he is a witness on the case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Brown's testimony you should proceed on the case.

If you have a case where we cannot proceed without Officer Brown's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Shauna or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Brown's cases they have and how many of those cases were dismissed.

If you or your ASAs have any questions, please call me. Thank you.



OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Officer Sean W. Sepcot, Star# 4094, 2<sup>nd</sup> District

Date: September 21, 2010

Cc: Adrienne Mebane, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Shauna Boliker, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Officer Sean W. Sepcot, Star# 4094 has been charged with Battery under Case No. 10 MC4-2061. Our office is the prosecuting authority in Officer Sepcot's case. The case is currently pending in Maywood and is next up on October 12, 2010. Pursuant to Brady v. Maryland, 373 U.S. 83 (1963) the prosecution's duty to disclose exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. Giglio v. United States, 405 U.S. 150, 154 (1972). As you are all well aware, the fact that any witness that we are calling to testify has a pending case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer

Sepcot as a witness, the fact that Officer Sepcot has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Sepcot is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Sepcot is a witness.

If you or the assistants that you supervise have a case where Officer Sepcot is a witness and you determine that he needs to be called as a witness in the case, please file and tender to the defense the attached Notice of Disclosure prior to trial. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)  
COUNTY OF COOK)

SS.

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS )  
 )  
 vs )  
 )  
 / )

Case No. \_\_\_\_\_

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Sean W. Sepcot, Star #4094, 2<sup>nd</sup> District has been charged with Battery under Case No. 10 MC4-2061. That case is next up on October 12, 2010 in the Fourth Municipal District Courthouse in Maywood, Illinois.
2. That Officer Sepcot will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Sepcot regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Sepcot regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

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Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Officer Christopher E. Bove, Star# 8230

Date: September 16, 2010

Cc: Adrienne Mebane, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Shauna Boliker, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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Chicago Police Officer Christopher E. Bove, Star# 8230 has been stripped of his police powers. Please have your ASAs check their files and see whether they have any cases on their call where Officer Bove is a witness. If he is a witness on a case please contact me immediately. Additionally if you or any of your assistants recall a case where Officer Bove was a witness in the past, please contact me as well.

If you or your assistants have any questions, please feel free to call me at (773) 869-2721.  
Thank you.



OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Officer Sean W. Sepcot, Star# 4094, 2<sup>nd</sup> District

Date: September 21, 2010

Cc: Adrienne Mebane, First Assistant  
Walt Hehner, Chief Deputy  
Dan Kirk, Chief of Staff  
Shauna Boliker, ASA, Chief, Criminal Prosecutions Bureau  
Jack Blakey, ASA, Chief, Special Prosecutions Bureau  
Patrick Driscoll, ASA, Chief, Civil Actions Bureau  
Tisa Morris, ASA, Chief, Juvenile Justice Bureau  
Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Officer Sean W. Sepcot, Star# 4094 has been charged with Battery under Case No. 10 MC4-2061. Our office is the prosecuting authority in Officer Sepcot's case. The case is currently pending in Maywood and is next up on October 12, 2010. Pursuant to Brady v. Maryland, 373 U.S. 83 (1963) the prosecution's duty to disclose exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. Giglio v. United States, 405 U.S. 150, 154 (1972). As you are all well aware, the fact that any witness that we are calling to testify has a pending case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer

Sepcot as a witness, the fact that Officer Sepcot has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Sepcot is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Sepcot is a witness.

If you or the assistants that you supervise have a case where Officer Sepcot is a witness and you determine that he needs to be called as a witness in the case, please file and tender to the defense the attached Notice of Disclosure prior to trial. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.



STATE OF ILLINOIS)  
 )  
COUNTY OF COOK) SS.

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS )  
 )  
vs ) Case No. \_\_\_\_\_  
 )  
/ )

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Sean W. Sepcot, Star #4094, 2<sup>nd</sup> District has been charged with Battery under Case No. 10 MC4-2061. That case is next up on October 12, 2010 in the Fourth Municipal District Courthouse in Maywood, Illinois.
2. That Officer Sepcot will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Sepcot regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Sepcot regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

\_\_\_\_\_  
Assistant State's Attorney

Assistant State's Attorney



OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: Shauna Boliker, ASA, Chief, Criminal Prosecutions Bureau  
Jack Blakey, ASA, Chief, Special Prosecutions Bureau  
Patrick Driscoll, ASA, Chief, Civil Actions Bureau  
Tisa Morris, ASA, Chief, Juvenile Justice Bureau  
Brian Sexton, ASA, Chief, Narcotics Prosecution Bureau  
All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re: Giglio Material Regarding Chicago Police Officers Slawomir Plewa, Robert Jackson  
and Gerald Lodwich

Date: September 24, 2010

Cc: Adrienne Mebane, First Assistant  
Walt Hehner, Chief Deputy  
Dan Kirk, Chief of Staff

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On August 19, 2010 Judge Michael Brown, in the case of The People of the State of Illinois v. Slawomir Plewa, Case No. 08CR-19286, made specific findings that Chicago Police Officers Slawomir Plewa, Star No. 14604 and Gerald Lodwich, Star No. 6958 lied and gave false testimony in the Plewa case as well as lied and gave false testimony in the case of The People of the State of Illinois v. Sylwia Marcinczyk, Case No. 07CR-8869.

In his findings in the Plewa case, Judge Brown also stated that Chicago Police Officer Robert Jackson, Star No. 15556 lied and gave false testimony in the Marcinczyk case. In the Plewa case, Judge Brown acquitted Officer Plewa of the offenses of Perjury, Official Misconduct and

Obstruction of Justice for conduct arising out of the Marcinczyk case. In doing so Judge Brown made the specific findings regarding Officers Plewa, Lodwich and Jackson.

Pursuant to Brady v. Maryland, 373 US 83 (1963) the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. Giglio v. United States, 405 U.S. 150, 154 (1972).

In light of the existing case law, Judge Brown's findings regarding the officers are Giglio material as "impeachment of a witness can make the difference between acquittal and conviction...where credibility is the central issue in the case and the evidence presented at trial consists of opposing stories presented by the defendant and government agents." United States v. Kiszewski, 877 F.2d 210, 216 (2<sup>nd</sup> Cir. 1985).

I have attached a Notice of Disclosure, as well the transcript of Judge Brown's findings that is to be filed with the court and tendered to the defense in all cases where any of the three officers are going to be called as witnesses. A copy of the transcript where Judge Brown made his findings is attached to the Notice of Disclosure. I will also send an email to each of you with the Notice of Disclosure attached.

Please make sure that your assistants file and tender to the defense the Notice of Disclosure in all cases where any of the three officers are or will be witnesses. Additionally the material should be filed and tendered in any case where any of the three officers have testified since August 19, 2010.

Also please remind your ASAs that the mere fact that this Giglio material is discoverable and has been tendered to the defense does not in and of itself mean that the defense can introduce the evidence at trial or cross-examine any of the officers on the material. Your ASAs should, in the appropriate cases, file all necessary motions to preclude the use of the Giglio material at trial.

The case law in this area is, of course, set out in United States v. Brady, 373 U.S. 83 (1963) and Giglio v. United States, 405 U.S. 150 (1972). The timing of disclosure is governed by Weatherford v. Bursey, 429 U.S. 545 (1997). What needs to be disclosed is discussed in United States v. Agurs, 427 U.S. 97 (1976); United States v. Diaz, 922 F.2d (2<sup>nd</sup> Cir. 1990); United States v. Veras, 51 F.3d 1365 (7<sup>th</sup> Cir. 1995) and United States v. Kiszewski, 877 F.2d 210 (2<sup>nd</sup> Cir. 1989). Limiting the use of this type of information is discussed in People v. Driskell, 213 Ill.App.3d 196 (4<sup>th</sup> Dist. 1991) and People v. Fonza, 217 Ill.App.3d 883, 892 (1st Dist. 1991).

STATE OF ILLINOIS)  
 )  
COUNTY OF COOK) SS.

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS )  
 )  
 vs ) Case No. \_\_\_\_\_  
 )  
 / )

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. On August 19, 2010, Judge Michael Brown, in the case of The People of the State of Illinois v. Slawomir Plewa, Indictment No. 08CR-19286 found that Chicago Police Officer(s) Slawomir Plewa, Star No. 14604/Gerald Lodwich Star No. 6958 lied and gave false testimony in the Plewa case as well as lied and gave false testimony in the case of The People of the State of Illinois v. Sylwia Marcinczyk, Indictment No. 07CR-8869.

2./1. On August 19, 2010, Judge Michael Brown, in the case of the The People of the State of Illinois v. Slawomir Plewa, Indictment No. 08CR-19286 found that Chicago Police Officer Robert Jackson, Star No. 6958 lied and gave false testimony in the case of The People of the State of Illinois v. Sylwia Marcinczyk, Indictment No. 07CR-8869.

3./2. A copy of the transcript of Judge Brown's findings with respect to Officer(s) Plewa/Lodwich/Jackson is attached as Exhibit A.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

\_\_\_\_\_  
Assistant State's Attorney

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Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Lynwood Police Officer Brain Dorian

Date: October 12, 2010

Cc: Adrienne Mebane, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Shauna Boliker, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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As you may already know, Lynwood Police Officer Brian Dorian was charged with First Degree Murder. Officer Dorian also was a police officer in Lansing. The vast majority, if not all, of Officer Dorian's cases should be in Markham. I have asked our MIS Department to prepare a list of the felony cases where Officer Dorian is a participant or witness. With respect to misdemeanor and traffic cases, please have your ASAs check their files and see whether they have any cases on their call where Officer Dorian is a witness. If he is a witness on the case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Dorian's testimony you should proceed on the case.

If you have a case where we cannot proceed without Officer Dorian's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Shauna or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Dorian's cases they have and how many of those cases were dismissed.

If you or your ASAs have any questions, please call me. Thank you.





OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *jm*

Re: Chicago Police Officer Donnie Lewis, Star#11145, 21<sup>st</sup> District

Date: October 26, 2010

Cc: Adrienne Mebane, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Shauna Boliker, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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Chicago Police Officer Donnie Lewis, Star# 11145 of the 21<sup>st</sup> District has been charged with Aggravated Battery under Case No. 10-4008138. Our office is the prosecuting authority in Officer Lewis' case. The case is currently pending in the Fourth District Courthouse in Maywood and is next up on October 29, 2010. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where Officer Lewis is a necessary witness and you are calling him as a witness, the fact that Officer Lewis has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Lewis is a witness on any pending felony cases. Once I have the results of that

search, I will forward them to each of you. Please don't call MIS and ask them to run another list. Units that do not have a computer case management system will have to check their files to determine whether Officer Lewis is a witness.

If you or the assistants that you supervise have a case where Officer Lewis is a necessary witness and you determine that he needs to be called in the case, and, at the time that Officer Lewis is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Detective John E. Killackey, III, Star #20163

Date: October 26, 2010

Cc: Adrienne Mebane, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Shauna Boliker, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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Chicago Police Detective John E. Killackey, III, Star #20163 has been placed on court supervision for the misdemeanor offenses of Aggravated Assault and Theft of Services under Case No. 10-1198469. Our office is the prosecuting authority in Detective Killackey's case. Detective Killackey's supervision is set to terminate on December 26, 2011.

If you or any of the assistants that you supervise have a case where you are calling Detective Killackey as a witness, the fact that Detective Killackey is currently on court supervision should be disclosed to the defense prior to trial as that fact would be relevant to his motive, interest or bias he may have in testifying as a witness for the State. The MIS Department is doing a computer search to see whether Detective Killackey is a witness on any pending felony cases. Once I have the results of

that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Detective Killackey is a witness.

If you or the assistants that you supervise have a case where Detective Killackey is a witness and you determine that he is a necessary witness who needs to be called in the case, and, at the time of his testimony Detective Killackey is still on court supervision, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS )  
 )  
 vs ) Case No. \_\_\_\_\_  
 )  
 / )

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That on June 24, 2010 Chicago Police Officer John E. Killackey, III, Star #20163, was placed on 18 months court supervision for the misdemeanor offenses of Aggravated Assault and Theft of Services under Case No. 10-1198469. The supervision is set to terminate on December 26, 2011.
2. That Officer Killackey will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Killackey regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Killackey regarding his court supervision in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

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Assistant State's Attorney

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**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

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From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Officer Donnie Lewis, Star#11145, 21<sup>st</sup> District

Date: October 26, 2010

Cc: Adrienne Mebane, First Assistant  
Walt Hehner, Chief Deputy  
Dan Kirk, Chief of Staff  
Shauna Boliker, ASA, Chief, Criminal Prosecutions Bureau  
Jack Blakey, ASA, Chief, Special Prosecutions Bureau  
Patrick Driscoll, ASA, Chief, Civil Actions Bureau  
Tisa Morris, ASA, Chief, Juvenile Justice Bureau  
Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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Chicago Police Officer Donnie Lewis, Star# 11145 of the 21<sup>st</sup> District has been charged with Aggravated Battery under Case No. 10-4008138. Our office is the prosecuting authority in Officer Lewis' case. The case is currently pending in the Fourth District Courthouse in Maywood and is next up on October 29, 2010. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where Office Lewis is a necessary witness and you are calling him as a witness, the fact that Officer Lewis has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Lewis is a witness on any pending felony cases. Once I have the results of that

search, I will forward them to each of you. Please don't call MIS and ask them to run another list. Units that do not have a computer case management system will have to check their files to determine whether Officer Lewis is a witness.

If you or the assistants that you supervise have a case where Officer Lewis is a necessary witness and you determine that he needs to be called in the case, and, at the time that Officer Lewis is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

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STATE OF ILLINOIS)  
COUNTY OF COOK)

SS.

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS )

VS

Case No. \_\_\_\_\_

/

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Donnie Lewis, Star #11145, has been charged with Aggravated Battery under Case No. 10-4008138. That case is next up on October 29, 2010 in the Fourth Municipal District, Maywood, Illinois.
2. That Officer Lewis will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Lewis regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Lewis regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

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Assistant State's Attorney

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**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

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From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officers: James Franklin, Star # 15170  
David Brown, Star # 15887  
Erika Rodriguez, Star # 11057  
Elvin Boone, Star # 1964

Date: October 28, 2010

Cc: Adrienne Mebane, First Assistant  
Walt Hehner, Chief Deputy  
Dan Kirk, Chief of Staff  
Shauna Boliker, ASA, Chief, Criminal Prosecutions Bureau  
Jack Blakey, ASA, Chief, Special Prosecutions Bureau  
Patrick Driscoll, ASA, Chief, Civil Actions Bureau  
Tisa Morris, ASA, Chief, Juvenile Justice Bureau  
Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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Please have your ASAs check their files to determine whether they have any cases on their call where Chicago Officers James Franklin, Star # 15170, David Brown, Star # 15887, Erika Rodriguez, Star # 11057 or Elvin Boone, Star # 1964 are witnesses. Each of these officers are assigned to the 3<sup>rd</sup> District. If any of these officers are witnesses on a pending case please determine whether the case can be proved without calling them as witnesses. If the cases cannot be proved without calling the officers as witnesses, please nolle the case. If the case can be proved without the officers' testimony, you should proceed on the case.

If you have a case where we cannot proceed without the officers' testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward, please contact Shauna or me prior to taking any action. Also, please have your ASAs keep track of how many cases involving these officers they have and how many of those cases were dismissed.

The MIS department is conducting a computer search to determine whether any of these officers are witnesses on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't ask MIS to have another list run. Units that don't have a computer case management system will have to check their files to determine whether any of these officers are witnesses on any pending cases.

If you or your ASAs have any questions, please call me. Thank you.



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

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To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re: Maywood Police Officer Robert M. Welch

Date: November 29, 2010

Cc: Adrienne Mebane, First Assistant  
Walt Hehner, Chief Deputy  
Dan Kirk, Chief of Staff  
Shauna Boliker, ASA, Chief, Criminal Prosecutions Bureau  
Jack Blakey, ASA, Chief, Special Prosecutions Bureau  
Patrick Driscoll, ASA, Chief, Civil Actions Bureau  
Tisa Morris, ASA, Chief, Juvenile Justice Bureau  
Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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As you may already know, Maywood Police Officer Robert M. Welch was recently charged with federal offenses. Our MIS Department has compiled a list of Officer Welch's felony cases. In the recent past, Officer Welch has primarily been a Maywood Police Officer. John Brassil will review the list and determine whether Officer Welch has been involved in any felony cases outside of Maywood.

If there are any such felony cases, John will notify you of that fact. If you or any of the assistants that you supervise have a case where Officer Welch is a witness, please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Welch's testimony

you should proceed on the case.

If you have a case where we cannot proceed without Officer Welch's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Shauna or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Welch's cases they have and how many of those cases were dismissed.

If you or your ASAs have any questions, please call me. Thank you.

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OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Thomas O'Brien, Star# 12964, Unit 153

Date: January 6, 2011

Cc: Shauna Boliker, First Assistant  
Walt Hehner, Chief Deputy  
Dan Kirk, Chief of Staff  
Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau  
Jack Blakey, ASA, Chief, Special Prosecutions Bureau  
Patrick Driscoll, ASA, Chief, Civil Actions Bureau  
Tisa Morris, ASA, Chief, Juvenile Justice Bureau  
Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Officer Thomas O'Brien, Star# 12964, Unit 153 has been charged with DUI under Ticket No. TW128069. Our office is the prosecuting authority in Officer O'Brien's case. The case is currently pending at Traffic Court in Chicago. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer O'Brien as a witness, the fact that Officer O'Brien has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer O'Brien is a witness on any pending felony cases. Once I have the results of that search, I will

forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer O'Brien is a potential witness.

If you or the assistants that you supervise have a case where Officer O'Brien is a witness and you determine that it is necessary to call him in the case, and, at the time that Officer O'Brien is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

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If you or your ASAs have any questions, please call me. Thank you.





Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

~~To:~~ All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer James Wodnicki, Star# 15289

Date: January 14, 2011

Cc: Shauna Boliker, First Assistant  
Walt Hehner, Chief Deputy  
Dan Kirk, Chief of Staff  
Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau  
Jack Blakey, ASA, Chief, Special Prosecutions Bureau  
Patrick Driscoll, ASA, Chief, Civil Actions Bureau  
Tisa Morris, ASA, Chief, Juvenile Justice Bureau  
Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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Please have your ASAs check their files and see whether they have any cases on their call where Chicago Police Officer James Wodnicki, Star# 15289 is a witness. If he is a witness on a case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Wodnicki's testimony you should proceed on the case.

If you have a case where we cannot proceed without Officer Wodnicki's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Wodnicki's cases they have and how

many of those cases were dismissed.

If you or your ASAs have any questions, please call me. Thank you.

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OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Illinois State Trooper Ramon Coss, ID # 6027

Date: January 14, 2011

Cc: Shauna Boliker, First Assistant  
Walt Hehner, Chief Deputy  
Dan Kirk, Chief of Staff  
Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau  
Jack Blakey, ASA, Chief, Special Prosecutions Bureau  
Patrick Driscoll, ASA, Chief, Civil Actions Bureau  
Tisa Morris, ASA, Chief, Juvenile Justice Bureau  
Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Illinois State Trooper Ramon Coss, ID # 6027 has been charged with Disorderly Conduct under Case No. 10 CM 458. The case is currently pending in the Circuit Court of Sauk County, Wisconsin. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Trooper Coss as a witness, the fact that Trooper Coss has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Trooper Coss is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case

management system will have to check their files to determine whether Trooper Coss is a witness.

If you or the assistants that you supervise have a case where Trooper Coss is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Trooper Coss is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

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STATE OF ILLINOIS)

SS.

COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY

PEOPLE OF THE STATE OF ILLINOIS )

VS

Case No. \_\_\_\_\_

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Illinois State Trooper Ramon Coss, ID# 6027 has been charged with Disorderly Conduct under Case No. 10 CM 458. That case is pending in the Circuit Court of Sauk County, Wisconsin.
2. That Trooper Coss will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Trooper Coss regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Trooper Coss regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

Assistant State's Attorney

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OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

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From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Charles Mc Clay, Star # 4735, 6<sup>th</sup> District

Date: January 25, 2011

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Officer Charles Mc Clay, Star# 4735, 6<sup>th</sup> District has been charged with DUI under Ticket No. TW021773. Our office is the prosecuting authority in Officer Mc Clay's case. The case is currently pending at Traffic Court in Chicago and is next up on February 25, 2011. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Mc Clay as a witness, the fact that Officer Mc Clay has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Mc Clay is a witness on any pending felony cases. Once I have the results of that search, I will forward them to

each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Mc Clay is a witness in any pending cases.

If you or the assistants that you supervise have a case where Officer McClay is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Mc Clay is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

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If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)  
COUNTY OF COOK)

SS.

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS )

vs

Case No. \_\_\_\_\_

/

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Charles Mc Clay, Star #4735, has been charged with DUI under Case No. TW021773. That case is next up on February 25, 2011 in Traffic Court, Daley Center, Chicago, Illinois.
2. That Officer Mc Clay will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Mc Clay regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Mc Clay regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

\_\_\_\_\_  
Assistant State's Attorney

Assistant State's Attorney



OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

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From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Kyle Gaffney, Star# 6245, 9<sup>th</sup> District

Date: January 26, 2011

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Officer Kyle Gaffney, Star# 6245, 9<sup>th</sup> District has been charged with DUI under Case No. TT473764. Our office is the prosecuting authority in Officer Gaffney's case. The case is currently pending at Traffic Court in Chicago and is next up on January 27, 2011. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Gaffney as a witness, the fact that Officer Gaffney has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Gaffney is a witness on any pending felony cases. Once I have the results of that search, I will

forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Gaffney is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Gaffney is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Gaffney is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

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If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

SS.

COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY

1

VS

Case No.

/

## NOTICE OF DISCLOSURE TO THE DEFENDANT

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Kyle Gaffney, Star #6245, has been charged with DUI under Case No. TT473764. That case is next up on January 27, 2011 at Traffic Court, Chicago Illinois.
2. That Officer Gaffney will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Gaffney regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Gaffney regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

Assistant State's Attorney

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OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

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From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *jm*

Re: Chicago Police Officer Dale Fleming, Star# 19955

Date: January 26, 2011

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Officer Dale Fleming, Star# 19955 has been charged with Domestic Battery under Case No. 11 DV 30086. Our office is the prosecuting authority in Officer Fleming's case. The case is currently pending in the Third Municipal District in Rolling Meadows and is next up on February 16, 2011. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Fleming as a witness, the fact that Officer Fleming has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer

Fleming is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Fleming is a witness in any pending cases.

If you or the assistants that you supervise have a case where Officer Fleming is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Fleming is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

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If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

SS.

COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY

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VS

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**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Dale Fleming, Star # 19955 has been charged with Domestic Battery under Case No. 11 DV 30086. That case is next up on February 16, 2011 in the Third Municipal District in Rolling Meadows, Illinois.
2. That Officer Fleming will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Fleming regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Fleming regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

Assistant State's Attorney



OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Dale Fleming, Star# 19955

Date: February 22, 2011

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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Please be advised that Chicago Police Officer Dale Fleming is no longer a defendant in a pending misdemeanor case. His case in Rolling Meadows was *nolle prosequere* on February 16, 2011. Thank you.



OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Joseph E. Avila, Star# 17883, 8<sup>th</sup> District

Date: February 22, 2011

Cc: Shauna Boliker, First Assistant  
Walt Hehner, Chief Deputy  
Dan Kirk, Chief of Staff  
Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau  
Jack Blakey, ASA, Chief, Special Prosecutions Bureau  
Patrick Driscoll, ASA, Chief, Civil Actions Bureau  
Tisa Morris, ASA, Chief, Juvenile Justice Bureau  
Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Officer Joseph E. Avila, Star# 17883, 8<sup>th</sup> District has been charged with Aggravated Assault under Case No. 11 DV 70368. Our office is the prosecuting authority in Officer Avila's case. The case is currently pending in Domestic Violence Court, Branch 60 in Chicago and is next up on March 11, 2011. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Avila as a witness, the fact that Officer Avila has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Avila is a

witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Avila is a witness.

If you or the assistants that you supervise have a case where Officer Avila is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Avila is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

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If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

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COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY

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**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Joseph E. Avila, Star #17883, has been charged with Aggravated Assault under Case No. 11 DV 70368. That case is next up on March 11, 2011 in Branch 60, 555 W. Harrison, Chicago, Illinois.
2. That Officer Avila will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Avila regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Avila regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney



Assistant State's Attorney



OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Dale Fleming, Star# 19955

Date: February 22, 2011

Cc: Shauna Boliker, First Assistant  
Walt Hehner, Chief Deputy  
Dan Kirk, Chief of Staff  
Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau  
Jack Blakey, ASA, Chief, Special Prosecutions Bureau  
Patrick Driscoll, ASA, Chief, Civil Actions Bureau  
Tisa Morris, ASA, Chief, Juvenile Justice Bureau  
Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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Please be advised that Chicago Police Officer Dale Fleming is no longer a defendant in a pending misdemeanor case. His case in Rolling Meadows was *nolle prosequere* on February 16, 2011. Thank you.



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Sylvia Broadway, Star No. 3330

Date: March 15, 2011

Cc: Shauna Boliker, First Assistant  
Walt Hehner, Chief Deputy  
Dan Kirk, Chief of Staff  
Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau  
Jack Blakey, ASA, Chief, Special Prosecutions Bureau  
Patrick Driscoll, ASA, Chief, Civil Actions Bureau  
Tisa Morris, ASA, Chief, Juvenile Justice Bureau  
Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Officer Sylvia Broadway, Star# 3330, has been charged with DUI under Case No. TW121699. Our office is the prosecuting authority in Officer Broadway's case. The case is currently pending at Traffic Court in Chicago and is next up on April 13, 2011 at Traffic Court in Chicago. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Broadway as a witness, the fact that Officer Broadway has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Broadway is a witness on any pending felony cases. Once I have the results of that search, I will

forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Broadway is a witness in any pending cases.

If you or the assistants that you supervise have a case where Officer Broadway is a witness and you determine that she is a necessary witness and needs to be called in the case, and, at the time that Officer Broadway is testifying her case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

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COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY

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**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Sylvia Broadway, Star #3330, has been charged with DUI under Case No. TW121699. That case is next up on April 14, 2011 in Traffic Court, Chicago, Illinois.
2. That Officer Broadway will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Broadway regarding her pending case in return for her testimony in the above-captioned case.
4. That no threats have been made to Officer Broadway regarding her pending case in return for her testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

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Assistant State's Attorney



OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Bruce Askew, Star# 9015

Date: March 15, 2011

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Officer Bruce Askew, Star# 9015, has been charged with Domestic Battery under Case No. 11 DV 7130. Our office is the prosecuting authority in Officer Askew's case. The case is currently pending at Branch 63 at 555 W. Harrison Street in Chicago and is next up on March 28, 2011. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Askew as a witness, the fact that Officer Askew has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Askew is a

witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Askew is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Askew is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Askew is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.



STATE OF ILLINOIS)

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COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY

PEOPLE OF THE STATE OF ILLINOIS )

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**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Bruce Askew, Star #9015, has been charged with Domestic Battery under Case No. 11 DV 71530. That case is next up on March 28, 2011 in Branch 63, 555 W. Harrison, Chicago, Illinois.
2. That Officer Askew will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Askew regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Askew regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

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Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Officer Venus Rodriguez, Star# 12474, Unit 007

Date: March 17, 2011

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Officer Venus Rodriguez, Star# 12474, 7<sup>th</sup> Dist. has been charged with Leaving the Scene of a Property Damage Accident under Case No. TW 171473. Our office is the prosecuting authority in Officer Rodriguez's case. The case is currently pending at Traffic Court in Chicago and is next up on April 13, 2011. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Rodriguez as a witness, the fact that Officer Rodriguez has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer

Rodriguez is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Rodriguez is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Rodriguez is a witness and you determine that she is a necessary witness and needs to be called in the case, and, at the time that Officer Rodriguez is testifying her case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

SS.

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

VS

Case No. \_\_\_\_\_

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

- Respectfully submitted,

By:

Assistant State's Attorney

Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Sean Dailey, Star# 10890

Date: March 22, 2011

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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Please have the ASAs that you supervise check their files and see whether they have any cases on their call where Chicago Police Officer Sean Dailey, Star# 10890, 16<sup>th</sup> District is a witness. With respect to felony cases, the MIS Department is doing a computer search to see whether Officer Dailey is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Dailey is a witness.

If he is a witness on the case, please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Dailey's testimony you should proceed on the

case.

If you have a case where we cannot proceed without Officer Dailey's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Dailey's cases they have and how many of those cases were dismissed.

If you or your ASAs have any questions, please call me. Thank you.





**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officers: Luis Contreras, Star# 13529  
Susana La Casa Caliz, Star# 8686

Date: March 28, 2011

Cc: Shauna Boliker, First Assistant  
Walt Hehner, Chief Deputy  
Dan Kirk, Chief of Staff  
Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau  
Jack Blakey, ASA, Chief, Special Prosecutions Bureau  
Patrick Driscoll, ASA, Chief, Civil Actions Bureau  
Tisa Morris, ASA, Chief, Juvenile Justice Bureau  
Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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Please have your ASAs check their files and see whether they have any cases on their call where Chicago Police Officers Luis Contreras, Star# 13529 or Susana La Casa Caliz, Star# 8686 are witnesses. With respect to felony cases, the MIS Department is doing a computer search to see whether Officers Contreras or Caliz are witnesses on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether these officers are witnesses.

If they are witnesses on a case please determine whether the case can be proved without

calling them as witnesses. If the case cannot be proved without calling them as witnesses, please nolle the case. If the case can be proved without the officers' testimony you should proceed on the case.

If you have a case where we cannot proceed without the officers' testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Contreras' and Caliz's cases they have and how many of those cases were dismissed.

If you or your ASAs have any questions, please call me. Thank you.



OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Bruce Askew, Star# 9015

Date: April 5, 2011

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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Please be advised that Chicago Police Officer Bruce Askew's, Star# 9015, Domestic Battery case, 11 DV 7130 has been nolle and is no longer pending.



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Richard Kleinpass, Star# 14625, 17<sup>th</sup> District

Date: April 12, 2011

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Officer Richard Kleinpass, Star# 14625, 17<sup>th</sup> District, has been charged with Violation of an Animal Owner's Duties, under Case No. 11 MC1-204301. Our office is the prosecuting authority in his case. The case is currently pending at Branch 44 at 3150 W. Flournoy Street in Chicago and is next up on April 27, 2011. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Kleinpass as a witness, the fact that Officer Kleinpass has a pending criminal case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer

Kleinpass is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Kleinpass is a witness.

If you or the assistants that you supervise have a case where Officer Kleinpass is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Kleinpass is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

) SS.

COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS )

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vs )

) Case No. \_\_\_\_\_  
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**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Richard Kleinpass, Star #14625, has been charged with Violation of Animal Owner's Duty under Case No. 11 MC1-204301. That case is next up on April 27, 2011 in Branch 44, 3150 W. Flourney, Chicago, Illinois.
2. That Officer Kleinpass will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Kleinpass regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Kleinpass regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez

State's Attorney of Cook County

By:

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Assistant State's Attorney

Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Matthew Koegler, Star# 12381, Unit 025

Date: April 25, 2011

Cc: Shauna Boliker, First Assistant  
Walt Hehner, Chief Deputy  
Dan Kirk, Chief of Staff  
Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau  
Jack Blakey, ASA, Chief, Special Prosecutions Bureau  
Patrick Driscoll, ASA, Chief, Civil Actions Bureau  
Tisa Morris, ASA, Chief, Juvenile Justice Bureau  
Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Officer Matthew Koegler, Star# 12381, Unit 025 has been charged with DUI under Case No. TW-113357. Our office is the prosecuting authority in Officer Koegler's case. The case is currently pending at Traffic Court in Chicago and is next up on June 1, 2011. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Koegler as a witness, the fact that Officer Koegler has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Koegler is a witness on any pending felony cases. Once I have the results of that search, I will



forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Koegler is a witness.

If you or the assistants that you supervise have a case where Officer Koegler is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Koegler is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

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COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY

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**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Matthew Koegler, Star #12381, has been charged with DUI under Case No. TW-113357. That case is next up on June 1, 2011 at Traffic Court, Daley Center, Chicago, Illinois.
2. That Officer Koegler will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Koegler regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Koegler regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

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Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2850 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Sgt. Edward Howard, Star# 2337, 6<sup>th</sup> District

Date: April 28, 2011

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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Please have your ASAs check their files and see whether they have any cases on their call where Chicago Police Sgt. Edward Howard, Star# 2337, 6<sup>th</sup> District is a witness. If he is a witness on a case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Sgt. Howard's testimony you should proceed on the case.

If you have a case where we cannot proceed without Sgt. Howard's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Sgt. Howard's cases they have and how many of those cases

were dismissed.

If you or your ASAs have any questions, please call me. Thank you.



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officers: Paul Clavijo, Star # 11392  
Juan Vasquez, Star # 15054

Date: May 13, 2011

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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As you may already know, Chicago Police Officers Paul Clavijo, Star# 11392 and Juan Vasquez, Star # 15054 have been charged with Criminal Sexual Assault and Official Misconduct. I have asked MIS to conduct a search on CRIMES to determine whether these officers are witnesses on any pending cases. I will forward the search results to you once I receive them. If you do not have a case management system, please have your ASAs check their files and see whether they have any cases on their call where Officers Clavijo or Vasquez are witnesses. If they are witnesses on any cases please determine whether the case can be proved without calling either as a witness. If the case cannot be proved without calling either of them as a witness, please nolle the case. If the case can be proved without either officer's testimony you should proceed on the case.

If you have a case where we cannot proceed without either officer's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Clavijo's and Office Vasquez's cases they have and how many of those cases were dismissed.

If you or your ASAs have any questions, please call me. Thank you.



OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Joseph E. Avila, Star# 17883, 8<sup>th</sup> District

Date: May 24, 2011

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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Please be advised that the Aggravated Assault case in which Chicago Police Officer Joseph E. Avila, Star# 17883, 8<sup>th</sup> District was a defendant was *nolle prosequere* on May 5, 2011. Thank you.





**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Frank Doyle, Star# 2926, 18<sup>th</sup> District.

Date: June 20, 2011

Cc: Shauna Boliker, First Assistant  
Walt Hehner, Chief Deputy  
Dan Kirk, Chief of Staff  
Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau  
Jack Blakey, ASA, Chief, Special Prosecutions Bureau  
Patrick Driscoll, ASA, Chief, Civil Actions Bureau  
Tisa Morris, ASA, Chief, Juvenile Justice Bureau  
Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Officer Frank Doyle, Star# 2926, 18<sup>th</sup> Dist. has been charged with Battery under Case No. 11-216360. Our office is the prosecuting authority in Officer Doyle's case. The case is currently pending at Branch 34 at 155 W. 51<sup>st</sup>. St. in Chicago and is next up on July 18, 2011. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Doyle as a witness, the fact that Officer Doyle has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Doyle is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case

management system will have to check their files to determine whether Officer Doyle is a witness.

If you or the assistants that you supervise have a case where Officer Doyle is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Doyle is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)  
 )  
COUNTY OF COOK) SS.

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS )  
 )  
vs ) Case No. \_\_\_\_\_  
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/ )

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Frank Doyle has been charged with Battery under Case No. 11-216360. That case is next up on July 18, 2011 in Branch 34, 155 W. 51<sup>st</sup>. Street, Chicago, Illinois.
2. That Officer Doyle will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Doyle regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Doyle regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

\_\_\_\_\_  
Assistant State's Attorney

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Assistant State's Attorney



OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Lamonica Lewis, Star 16172, 2<sup>nd</sup> Dist

Date: June 20, 2011

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Officer Lamonica Lewis, Star# 16172, 2<sup>nd</sup> Dist. has been charged with DUI. Our office is the prosecuting authority in Officer Lewis' case. The case is currently pending at Traffic Court in Chicago and is next up on July 26, 2011. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Lewis as a witness, the fact that Officer Lewis has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Lewis is a witness on any pending felony cases. Once I have the results of that search, I will forward them to

each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Lewis is a witness.

If you or the assistants that you supervise have a case where Officer Lewis is a witness and you determine that she is a necessary witness and needs to be called in the case, and, at the time that Officer Lewis is testifying her case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

SS.

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS

VS

Case No. \_\_\_\_\_

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Lamonica Lewis, Star #16172, has been charged with DUI. That case is next up on July 26, 2011 in Traffic Court, Room 404, Daley Center, Chicago, Illinois.
2. That Officer Lewis will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Lewis regarding her pending case in return for her testimony in the above-captioned case.
4. That no threats have been made to Officer Lewis regarding her pending case in return for her testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

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Assistant State's Attorney





OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Joseph Simpson, Star# 19086

Date: June 30, 2011

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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As you may already know, Chicago Police Officer Joseph Simpson, Star# 19086, 18<sup>th</sup> District was charged with Financial Exploitation of an Elderly Person. Please have your ASAs check their files and see whether they have any cases on their call where Officer Simpson is a witness. If he is a witness on the case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Simpson's testimony you should proceed on the case.

The MIS Department is doing a computer search to see whether Officer Simpson is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Simpson is a witness

on any pending cases.

If you have a case where we cannot proceed without Officer Simpson's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Simpson's cases they have and how many of those cases were dismissed.

If you or your ASAs have any questions, please call me. Thank you.



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Joseph E. Avila, Star# 17883, 8<sup>th</sup> District

Date: July 12, 2011

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Officer Joseph E. Avila, Star# 17883, 8<sup>th</sup> District has been charged with Aggravated Assault under Case No. 11 DV 74883. Our office is the prosecuting authority in Officer Avila's case. The case is currently pending in Domestic Violence Court, Branch 60 in Chicago and is next up on July 22, 2011. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Avila as a witness, the fact that Officer Avila has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Avila is a

witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Avila is a witness.

If you or the assistants that you supervise have a case where Officer Avila is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Avila is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.



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Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Burdett Griffin, III, Star# 19118, 5<sup>th</sup> District

Date: August 8, 2011

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Officer Burdett Griffin, Star# 19118, 5<sup>th</sup> Dist. has been charged with Domestic Battery under Case No. 11 DV 76680. Our office is the prosecuting authority in Officer Griffin's case. The case is currently pending at Branch 62, 555 West Harrison St. in Chicago and is next up on August 22, 2011. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Griffin as a witness, the fact that Officer Griffin has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Griffin is a

witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Griffin is a witness.

If you or the assistants that you supervise have a case where Officer Griffin is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Griffin is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.



STATE OF ILLINOIS)  
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COUNTY OF COOK) SS.

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS )  
 )  
vs ) Case No. \_\_\_\_\_  
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/ )

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Burdett Griffin, Star #19118, has been charged with Domestic Battery under Case No. 11 DV 76680. That case is next up on August 22, 2011 in Branch 62, 555 W. Harrison, Chicago, Illinois.
2. That Officer Griffin will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Griffin regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Griffin regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

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Assistant State's Attorney

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Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

**ANITA ALVAREZ  
STATE'S ATTORNEY**

**CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608**

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Timothy Cullinan, Star # 7365

Date: August 12, 2011

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Officer Timothy Cullinan, Star# 7365, has been charged with Violation of an Order of Protection and Telephone Harassment under Case No. 11 DV 7557. Our office is the prosecuting authority in Officer Cullinan's case. The case is currently pending at Branch 64, 555 W. Harrison St. in Chicago and is next up on August 25, 2011. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Cullinan as a witness, the fact that Officer Cullinan has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer

Cullinan is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Cullinan is a witness.

If you or the assistants that you supervise have a case where Officer Cullinan is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Cullinan is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)  
COUNTY OF COOK)

SS.

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS )

vs )

/ )

Case No. \_\_\_\_\_

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Timothy Cullinan, Star #7365, has been charged with Violation of an Order of Protection and Telephone Harassment under Case No. 11 DV 7557. That case is next up on August 12, 2011 in Branch 64, 555 W. Harrison, Chicago, Illinois.
2. That Officer Cullinan will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Cullinan regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Cullinan regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

\_\_\_\_\_  
Assistant State's Attorney

Assistant State's Attorney



OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Frank Doyle, Star# 2926, 18<sup>th</sup> District

Date: August 30, 2011

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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Please be advised that the Battery case in which Chicago Police Officer Frank Doyle, Star# 2926, 18<sup>th</sup> District was a defendant was *nolle prosequere* on August 30, 2011. Thank you.



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Robbins/Markham Police Officer Charles Smith

Date: September 29, 2011

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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As you may already know, Robbins Police Officer Charles Smith, Star# 350 has been charged with the offense of UYW by a Felon. Officer Smith also was a recent member of the Markham Police Department. His star number there was # 549. MIS is running a computer search on CRIMES to determine whether he is a witness on any pending felony cases. Once I have the results of that search, I will forward them to you. Those units without a computer case management system will have to check their individual files to determine whether the officer is a witness on any pending cases.

If Officer Smith is a witness on a case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness,



please nolle the case. If the case can be proved without Officer Smith's testimony you should proceed on the case.

If you have a case where we cannot proceed without Officer Smith's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Smith's cases they have and how many of those cases were dismissed.

If you or your ASAs have any questions, please call me. Thank you.



OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Victoria Gutierrez, Star# 15542, Unit 012

Date: September 29, 2011

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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As you may already know, Chicago Police Officer Victoria Gutierrez, Star# 15542 has been indicted for the offense of Aggravated Battery to a Police Officer under indictment number 11CR-12857. MIS is running a computer search on CRIMES to determine whether she is a witness on any pending felony cases. Once I have the results of that search, I will forward them to you. Those units without a computer case management system will have to check their individual files to determine whether the officer is a witness on any pending cases.

If Officer Gutierrez is a witness on a case please determine whether the case can be proved without calling her as a witness. If the case cannot be proved without calling her as a witness, please nolle the case. If the case can be proved without Officer Gutierrez's testimony you should proceed

on the case.

If you have a case where we cannot proceed without Officer Gutierrez's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Gutierrez's cases they have and how many of those cases were dismissed.

If you or your ASAs have any questions, please call me. Thank you.



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Slyshina London, Star# 11636, Unit 004

Date: September 29, 2011

Cc: Shauna Boliker, First Assistant  
Walt Hehner, Chief Deputy  
Dan Kirk, Chief of Staff  
Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau  
Jack Blakey, ASA, Chief, Special Prosecutions Bureau  
Patrick Driscoll, ASA, Chief, Civil Actions Bureau  
Tisa Morris, ASA, Chief, Juvenile Justice Bureau  
Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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As you may already know, Chicago Police Officer Slyshina London, Star# 11636 has been indicted for the offense of Perjury under indictment number 11CR-14420. MIS is running a computer search on CRIMES to determine whether she is a witness on any pending felony cases. Once I have the results of that search, I will forward them to you. Those units without a computer case management system will have to check their individual files to determine whether the officer is a witness on any pending cases.

If Officer London is a witness on a case please determine whether the case can be proved without calling her as a witness. If the case cannot be proved without calling her as a witness, please nolle the case. If the case can be proved without Officer London's testimony you should proceed on

the case.

If you have a case where we cannot proceed without Officer London's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer London's cases they have and how many of those cases were dismissed.

If you or your ASAs have any questions, please call me. Thank you.



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Officer Jeffrey Gniadek, Star# 18497, Unit 376

Date: September 29, 2011

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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As you may already know, Chicago Police Officer Jeffrey Gniadek, Star# 18797 has been indicted for the offense of Threatening a Public Official under indictment number 11CR-13609. MIS is running a computer search on CRIMES to determine whether he is a witness on any pending felony cases. Once I have the results of that search, I will forward them to you. Those units without a computer case management system will have to check their individual files to determine whether the officer is a witness on any pending cases.

If Officer Gniadek is a witness on a case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Gniadek's testimony you should

proceed on the case.

If you have a case where we cannot proceed without Officer Gniadek's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Gniadek's cases they have and how many of those cases were dismissed.

If you or your ASAs have any questions, please call me. Thank you.



OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: Jack Blakey, ASA, Chief, Special Prosecutions Bureau  
Patrick Driscoll, ASA, Chief, Civil Actions Bureau  
Tisa Morris, ASA, Chief, Juvenile Justice Bureau  
Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau  
Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau  
All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Giglio Material Regarding Chicago Police Officer Gerald Lodwich

Date: September 30, 2011

Cc: Shauna Boliker, First Assistant  
Walt Hehner, Chief Deputy  
Dan Kirk, Chief of Staff

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Last year a memo and Notice of Disclosure were distributed throughout the office regarding Giglio material pertaining to Chicago Police Officer Gerald Lodwich in that a judge found that Officer Lodwich, and two other officers, Slawomir Plewa and Robert Jackson, had given false testimony in two criminal cases: The People of the State of Illinois v. Slawomir Plewa and The People of the State of Illinois v. Sylwia Marcinczyk. As a result of those findings the Internal Affairs Division of the Chicago Police Department conducted an investigation into Officer Lodwich's testimony in those two cases. The results of that investigation concluded that the allegations that Officer Lodwich had given false testimony in the two criminal cases were unfounded.

Accordingly, the Notice of Disclosure containing Officer Lodwich should no longer be filed in cases where Officer Lodwich is being or will be called as a witness. Attached is a Notice of Disclosure that should be used in the event Officers Plewa or Jackson is going to be called as witnesses in a case. If anyone has any questions, please feel free to contact me. Thank you.



STATE OF ILLINOIS)  
 )  
COUNTY OF COOK) SS.

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS )  
 )  
vs ) Case No. \_\_\_\_\_  
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/ )

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. On August 19, 2010, Judge Michael Brown, in the case of The People of the State of Illinois v. Slawomir Plewa, Indictment No. 08CR-19286 found that Chicago Police Officer(s) Slawomir Plewa, Star No. 14604 lied and gave false testimony in the Plewa case as well as lied and gave false testimony in the case of The People of the State of Illinois v. Sylwia Marcinczyk, Indictment No. 07CR-8869.

2./1. On August 19, 2010, Judge Michael Brown, in the case of the The People of the State of Illinois v. Slawomir Plewa, Indictment No. 08CR-19286 found that Chicago Police Officer Robert Jackson, Star No. 15556 lied and gave false testimony in the case of The People of the State of Illinois v. Sylwia Marcinczyk, Indictment No. 07CR-8869.

3./2. A copy of the transcript of Judge Brown's findings with respect to Officer(s) Plewa/Jackson is attached as Exhibit A.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

\_\_\_\_\_  
Assistant State's Attorney

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Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Kyle Gaffney, Star# 6245, 9<sup>th</sup> District

Date: January 31, 2012

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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Please be advised that the DUI case in which Chicago Police Officer Kyle Gaffney, Star# 6245, 9<sup>th</sup> District was a defendant resulted in a finding of not guilty. Thank you.



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

**ANITA ALVAREZ  
STATE'S ATTORNEY**

**CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608**

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Detective Richard A. Milz, Star #21200

Date: February 1, 2012

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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Chicago Police Detective Richard A. Milz, Star #21200 has been placed on court supervision for the misdemeanor offense of Disorderly Conduct under Case No. 11-1224061. Our office is the prosecuting authority in Detective Milz's case. Detective Milz's supervision is set to terminate on September 26, 2012.

If you or any of the assistants that you supervise have a case where you are calling Detective Milz as a witness, the fact that Detective Milz is currently on court supervision should be disclosed to the defense prior to trial as that fact would be relevant to his motive, interest or bias he may have in testifying as a witness for the State. The MIS Department is doing a computer search to see whether Detective Milz is a witness on any pending felony cases. Once I have the results of that

search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Detective Milz is a witness.

If you or the assistants that you supervise have a case where Detective Milz is a witness and you determine that he is a necessary witness who needs to be called in the case, and, at the time of his testimony Detective Milz is still on court supervision, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Detective Richard A. Milz, Star #21200

Date: February 1, 2012

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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Chicago Police Detective Richard A. Milz, Star #21200 has been placed on court supervision for the misdemeanor offense of Disorderly Conduct under Case No. 11-1224061. Our office is the prosecuting authority in Detective Milz's case. Detective Milz's supervision is set to terminate on September 26, 2012.

If you or any of the assistants that you supervise have a case where you are calling Detective Milz as a witness, the fact that Detective Milz is currently on court supervision should be disclosed to the defense prior to trial as that fact would be relevant to his motive, interest or bias he may have in testifying as a witness for the State. The MIS Department is doing a computer search to see whether Detective Milz is a witness on any pending felony cases. Once I have the results of that

search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Detective Milz is a witness.

If you or the assistants that you supervise have a case where Detective Milz is a witness and you determine that he is a necessary witness who needs to be called in the case, and, at the time of his testimony Detective Milz is still on court supervision, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

SS.

COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS )

Case No. \_\_\_\_\_

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**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That on September 27, 2011 Chicago Police Officer Richard A. Milz, Star #22100, was placed on twelve months court supervision for the misdemeanor offense of Disorderly Conduct under Case No. 11-1224061. The supervision is set to terminate on September 26, 2012.
2. That Officer Milz will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Milz regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Milz regarding his court supervision in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney



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Assistant State's Attorney



OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Thomas O'Brien, Star# 12964, Unit 153 *JM*

Date: February 2, 2012

Cc: Shauna Boliker, First Assistant  
Walt Hehner, Chief Deputy  
Dan Kirk, Chief of Staff  
Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau  
Jack Blakey, ASA, Chief, Special Prosecutions Bureau  
Patrick Driscoll, ASA, Chief, Civil Actions Bureau  
Tisa Morris, ASA, Chief, Juvenile Justice Bureau  
Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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Chicago Police Thomas O'Brien, Star# 12964, Unit 153 has been placed on two years court supervision for the misdemeanor offense of DUI under Ticket No. TW128069. Our office is the prosecuting authority in Officer O'Brien's case. Officer O'Brien's supervision is set to terminate on January 24, 2014.

If you or any of the assistants that you supervise have a case where you are calling Officer O'Brien as a witness, the fact that Officer O'Brien is currently on court supervision should be disclosed to the defense prior to trial as that fact would be relevant to any motive, interest or bias he may have in testifying as a witness for the State. The MIS Department is doing a computer search to see whether Officer O'Brien is a witness on any pending felony cases. Once I have the results of that

search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer O'Brien is a witness.

If you or the assistants that you supervise have a case where Officer O'Brien is a witness and you determine that he is a necessary witness who needs to be called in the case, and, at the time of his testimony Officer O'Brien is still on court supervision, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.



OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Harvey Police Officer Joseph Ellison, Star #629

Date: February 7, 2012

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Harvey Police Officer Joseph Ellison, Star# 629 has been charged with DUI under Case No. YT694321. Our office is the prosecuting authority in Officer Ellison's case. The case is currently pending in Maywood and is next up on February 10, 2012. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Ellison as a witness, the fact that Officer Ellison has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Ellison is a witness on any pending felony cases. Once I have the results of that search, I will forward them to

each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Ellison is a witness.

If you or the assistants that you supervise have a case where Officer Ellison is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Ellison is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officers Kallatt Mohammed, Star# 14122, 2<sup>nd</sup> District  
Ronald Watts, Star# 2640, 2<sup>nd</sup> District

Date: February 14, 2012

Cc: Shauna Boliker, First Assistant  
Walt Hehner, Chief Deputy  
Dan Kirk, Chief of Staff  
Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau  
Jack Blakey, ASA, Chief, Special Prosecutions Bureau  
Patrick Driscoll, ASA, Chief, Civil Actions Bureau  
Tisa Morris, ASA, Chief, Juvenile Justice Bureau  
Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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As you may already know, Chicago Police Officers Kallatt Mohammed, Star# 14122 and Sgt. Ronald Watts, Star# 2640 were charged in a federal complaint with the offense of Theft of Government Funds. MIS is conducting a search of CRIMES to determine whether the officers are witnesses on any pending felony cases. Once I have the results of that search, I will forward the results to you. If your unit does not have a computer case management system, please have your ASAs check their files and see whether they have any cases on their call where either Officers Mohammed or Watts are witnesses on any pending cases. If either is a witness on the case please determine whether the case can be proved without calling the officer as a witness. If the case cannot be proved without calling the officer as a witness, please nolle the case. If the case can be proved

without the officer's testimony you should proceed on the case.

If you have a case where we cannot proceed without either officer's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Mohammed's and Sgt. Watts' cases they have and how many of those cases were dismissed.

If you or your ASAs have any questions, please call me. Thank you.



OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau  
Jack Blakey, ASA, Chief, Special Prosecutions Bureau  
Patrick Driscoll, ASA, Chief, Civil Actions Bureau  
Tisa Morris, ASA, Chief, Juvenile Justice Bureau  
Brian Sexton, ASA, Chief, Narcotics Prosecution Bureau  
All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re: Giglio Material Regarding Park Forest Police Sgt. Steve Zanoni

Date: March 6, 2012

Cc: Shauna Boliker, First Assistant  
Walt Hehner, Chief Deputy  
Dan Kirk, Chief of Staff

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On February 6, 2012 Judge Noreen V. Love, in the case of The People of the State of Illinois v. Stephen B. Lewis, Case No. 11CR-21047, made a specific finding that Forest Park Police Sgt. Steve Zanoni, Star No. 113, intentionally made a false statement in front of the grand jury while testifying in In re: People vs. Stephen B. Lewis, Grand Jury No. 358 of December 2011.

Pursuant to Brady v. Maryland, 373 US 83 (1963) the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. Giglio v. United States, 405 U.S. 150, 154 (1972).



In light of the existing case law, Judge Love's finding regarding Sgt. Zanon is Giglio material as "impeachment of a witness can make the difference between acquittal and conviction...where credibility is the central issue in the case and the evidence presented at trial consists of opposing stories presented by the defendant and government agents." United States v. Kiszewski, 877 F.2d 210, 216 (2<sup>nd</sup> Cir. 1985).

I have attached a Notice of Disclosure, as well the transcript of Judge Love's findings that is to be filed with the court and tendered to the defense in all cases where Sgt. Zanon is going to be called as witnesses. A copy of the transcript where Judge Love made her finding is attached to the Notice of Disclosure. I will also send an email to each of you with the Notice of Disclosure attached.

Please make sure that your assistants file and tender to the defense the Notice of Disclosure in all cases where Sgt. Zanon will be called as a witnesses. Additionally the material should be filed and tendered in any case where Sgt. Zanon has testified since February 6, 2012.

Also please remind your ASAs that the mere fact that this Giglio material is discoverable and has been tendered to the defense does not in and of itself mean that the defense can introduce the evidence at trial or cross-examine Sgt. Zanon on the material. Your ASAs should, in the appropriate cases, file all necessary motions to preclude the use of the Giglio material at trial.

The case law in this area is, of course, set out in United States v. Brady, 373 U.S. 83 (1963) and Giglio v. United States, 405 U.S. 150 (1972). The timing of disclosure is governed by Weatherford v. Bursey, 429 U.S. 545 (1997). What needs to be disclosed is discussed in United States v. Agurs, 427 U.S. 97 (1976); United States v. Diaz, 922 F.2d (2<sup>nd</sup> Cir. 1990); United States v. Veras, 51 F.3d 1365 (7<sup>th</sup> Cir. 1995) and United States v. Kiszewski, 877 F.2d 210 (2<sup>nd</sup> Cir. 1989). Limiting the use of this type of information is discussed in People v. Driskell, 213 Ill.App.3d 196 (4<sup>th</sup> Dist. 1991) and People v. Fonza, 217 Ill.App.3d 883, 892 (1st Dist. 1991).

STATE OF ILLINOIS)  
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COUNTY OF COOK) SS.

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS )  
 )  
vs ) Case No. \_\_\_\_\_  
 )  
/ )

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. On February 6, 2012, Judge Noreen V. Love, in the case of The People of the State of Illinois v. Stephen B. Lewis, Indictment No. 11CR-21047 found that Forest Park Police Sgt. Steve Zanoni, Star No. 113, intentionally made a false statement in front of the grand jury while testifying in In re: People vs. Stephen B. Lewis, Grand Jury No. 358 of December 2011.
2. A copy of the transcript of Judge Love's finding with respect to Sgt. Zanoni is attached as Exhibit A.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

\_\_\_\_\_  
Assistant State's Attorney

\_\_\_\_\_  
Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Cook County Sheriff's Police Officer Lawrence Draus, Star# 485

Date: March 15, 2012

Cc: Shauna Boliker, First Assistant  
Walt Hehner, Chief Deputy  
Dan Kirk, Chief of Staff  
Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau  
Jack Blakey, ASA, Chief, Special Prosecutions Bureau  
Patrick Driscoll, ASA, Chief, Civil Actions Bureau  
Tisa Morris, ASA, Chief, Juvenile Justice Bureau  
Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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As you may already know, Cook County Sheriff's Police Officer Lawrence Draus, Star# 485 has been named a defendant in a federal criminal complaint. MIS is conducting a search of CRIMES to determine whether Officer Draus is a witness on any pending felony cases. Once I have the results of that search, I will forward the results to you. If your unit does not have a computer case management system, please have your ASAs check their files and see whether they have any cases on their call where Officer Draus is a witness on a pending case. If he is a witness on the case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Draus' testimony you should proceed on the case.

If you have a case where we cannot proceed without Officer Draus' testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Draus' cases they have and how many of those cases were dismissed.

If you or your ASAs have any questions, please call me. Thank you.



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Samuel C. Kendrick, Jr., Star# 18613

Date: May 25, 2012

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Officer Samuel C. Kendrick, Jr., Star# 18613 has been charged with Domestic Battery under Case No. 12DV-71869. Our office is the prosecuting authority in Officer Kendrick's case. The case is currently pending at Domestic Violence Court, Branch 64, at 555 W. Harrison in Chicago and is next up on June 8, 2012. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Kendrick as a witness, the fact that Officer Kendrick has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer

Kendrick is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Kendrick is a witness.

If you or the assistants that you supervise have a case where Officer Kendrick is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Kendrick is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)  
COUNTY OF COOK) SS.

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS )  
vs ) Case No. \_\_\_\_\_  
/ )

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Samuel C. Kendrick, Jr., Star# 18613 has been charged with Domestic Battery under Case No. 12DV-71869. That case is next up on June 8, 2012 in Branch 64, 555 W. Harrison, Chicago, Illinois.
2. That Officer Kendrick will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Kendrick regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Kendrick regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

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Assistant State's Attorney

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Assistant State's Attorney





**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Charles McClay, Star# 4735, 6<sup>th</sup> District

Date: June 6, 2012

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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On June 5, 2012, Chicago Police Officer Charles McClay, Star# 4735, 6<sup>th</sup> District was placed on eighteen months court supervision for the misdemeanor offense of DUI under Ticket No. TW021773. Our office is the prosecuting authority in Officer McClay's case.

If you or any of the assistants that you supervise have a case where you are calling Officer McClay as a witness, the fact that Officer McClay is currently on court supervision should be disclosed to the defense prior to trial as that fact would be relevant to any motive, interest or bias he may have in testifying as a witness for the State. The MIS Department is doing a computer search to see whether Officer McClay is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that

do not have a computer case management system will have to check their files to determine whether Officer McClay is a witness.

If you or the assistants that you supervise have a case where Officer McClay is a witness and you determine that he is a necessary witness who needs to be called in the case, and, at the time of his testimony Officer McClay is still on court supervision, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.




OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau 

Re: Chicago Police Officer Matthew Koegler, Star# 12381, Unit 025

Date: July 23, 2012

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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Please be advised that the DUI case in which Chicago Police Officer Matthew Koegler, Star# 12381, 25<sup>th</sup> District was a defendant was *nolle prosequere* on July 12, 2012. Thank you.



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL DIVISION  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Officer Venus Rodriguez, Star# 12474, Unit 007 *JM*

Date: July 23, 2012

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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Please be advised that Chicago Police Officer Venus Rodriguez, Star# 12474, 7<sup>th</sup> District was acquitted of the charge of Leaving the Scene of a Property Damage Accident under Case No. TW 171473. Thank you.



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re: Illinois State Trooper Brian Himber

Date: July 23, 2012

Cc: Shauna Boliker, First Assistant  
Walt Hehner, Chief Deputy  
Dan Kirk, Chief of Staff  
Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau  
Jack Blakey, ASA, Chief, Special Prosecutions Bureau  
Patrick Driscoll, ASA, Chief, Civil Actions Bureau  
Tisa Morris, ASA, Chief, Juvenile Justice Bureau  
Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

A handwritten signature in black ink, appearing to be "AM", is written over the "From:" line and extends slightly into the "Re:" line.

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As you may already know, Illinois State Trooper Brian Himber was charged with First Degree Murder. MIS is conducting a search of CRIMES to determine whether Trooper Himber is a witness on any pending felony cases. Once I have the results of that search, I will forward the results to you. If your unit does not have a computer case management system, please have your ASAs check their files and see whether they have any cases on their call where Trooper Himber is a witness on a pending case. If he is a witness on the case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Trooper Himber's testimony you should proceed on the case.

If you have a case where we cannot proceed without Himber's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Trooper Himber's cases they have and how many of those cases were dismissed.

If you or your ASAs have any questions, please call me. Thank you.



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Charlene Kumiga., Star# 19576

Date: August 13, 2012

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Officer Charlene Kumiga, Star# 19576 has been charged with Leaving the Scene of an Accident Involving an Unattended Vehicle under Ticket number B600987. Our office is the prosecuting authority in Officer Kumiga's case. The case is currently pending at Traffic Court, Room 404 at the Daley Center and is next up on September 24, 2012. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Kumiga as a witness, the fact that Officer Kumiga has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer

Kumiga is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Kumiga is a witness.

If you or the assistants that you supervise have a case where Officer Kumiga is a witness and you determine that she is a necessary witness and needs to be called in the case, and, at the time that Officer Kumiga is testifying her case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.



STATE OF ILLINOIS)

SS.

COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY

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## NOTICE OF DISCLOSURE TO THE DEFENDANT

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Charlene Kumiga, Star #19576, has been charged with Leaving the Scene of an Accident Involving an Unattended Vehicle under Ticket No. B6009897. That case is pending at Traffic Court in Room 404, Daley Center, Chicago, Illinois.
2. That Officer Kumiga will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Kumiga regarding her pending case in return for her testimony in the above-captioned case.
4. That no threats have been made to Officer Kumiga regarding her pending case in return for her testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

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Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Cook County Sheriff's Police Officer Juan Carlos Carmona, Star# 397

Date: August 14, 2012

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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It has come to the office's attention that Cook County Sheriff's Police Officer Juan Carlos Carmona, Star# 397 was indicted federally for various criminal offenses under indictment number 12 CR 573. MIS is conducting a search of CRIMES to determine whether Officer Carmona is a witness on any pending felony cases. Once I have the results of that search, I will forward the results to you. If your unit does not have a computer case management system, please have your ASAs check their files and see whether they have any cases on their call where Officer Carmona is a witness on a pending case. If he is a witness on the case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Carmona's testimony you should proceed on the case.

If you have a case where we cannot proceed without Carmona's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Carmona's cases they have and how many of those cases were dismissed.

If you or your ASAs have any questions, please call me. Thank you.




**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau 

Re: Cook County Sheriff's Deputy Samuel J. Spino, Star# 11055

Date: August 17, 2012

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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It has come to the office's attention that Cook County Sheriff's Deputy Samuel J. Spino has been charged federally with Theft. MIS is conducting a search of CRIMES to determine whether Deputy Spino is a witness on any pending felony cases. Once I have the results of that search, I will forward the results to you. If your unit does not have a computer case management system, please have your ASAs check their files and see whether they have any cases on their call where Deputy Spino is a witness on a pending case. If he is a witness on the case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Deputy Spino's testimony you should proceed on the case.

If you have a case where we cannot proceed without Spino's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Deputy Spino's cases they have and how many of those cases were dismissed.

If you or your ASAs have any questions, please call me. Thank you.



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Samson Dadi, Star# 15942

Date: August 17, 2012

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Officer Samson Dadi, Star# 15942 has been charged with DUI under Ticket No. T B577222. Our office is the prosecuting authority in Officer Dadi's case. The case is currently pending in Traffic Court, Room 406, at the Daley Center. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Dadi as a witness, the fact that Officer Dadi has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Dadi is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you.

Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Dadi is a witness.

If you or the assistants that you supervise have a case where Officer Dadi is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Dadi is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.






**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau 

Re: Chicago Police Officer Darryl Brown, Star# 12049,

Date: August 27, 2012

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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On August 24, 2012 Chicago Police Officer Darryl Brown, Star# 12049, has been placed on twelve months court supervision for the misdemeanor offenses of DUI, under Ticket No. M0501906, and Failure to Reduce Speed to Avoid an Accident under Ticket No. TT293165. Our office is the prosecuting authority in Officer Brown's case. Officer Brown's supervision is set to terminate on August 23, 2013.

If you or any of the assistants that you supervise have a case where you are calling Officer Brown as a witness, the fact that Officer Brown is currently on court supervision should be disclosed to the defense prior to trial as that fact would be relevant to any motive, interest or bias he may have in testifying as a witness for the State. The MIS Department is doing a computer search to see

whether Officer Brown is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Brown is a witness.

If you or the assistants that you supervise have a case where Officer Brown is a witness and you determine that he is a necessary witness who needs to be called in the case, and, at the time of his testimony Officer Brown is still on court supervision, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

SS.

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS )

VS

Case No. \_\_\_\_\_

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**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That on August 24, 2012, Chicago Police Officer Darryl Brown, Star #12049, was placed on twelve months court supervision for the misdemeanor offenses of DUI, under ticket number M0501906, and Failure to Reduce Speed to Avoid an Accident under ticket number TT293165.
2. That Officer Brown will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Dunn in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Dunn in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

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Assistant State's Attorney




**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Officer Harold Rodriguez, Star# 17679, 10<sup>th</sup> District 

Date: September 19, 2012

Cc: Shauna Boliker, First Assistant  
Walt Hehner, Chief Deputy  
Dan Kirk, Chief of Staff  
Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau  
Jack Blakey, ASA, Chief, Special Prosecutions Bureau  
Patrick Driscoll, ASA, Chief, Civil Actions Bureau  
Tisa Morris, ASA, Chief, Juvenile Justice Bureau  
Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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As you may already know, Chicago Police Officer Harold Rodriguez, Star# 17679, 10<sup>th</sup> District has been charged with Bribery and Official Misconduct. MIS has conducted a search of CRIMES to determine whether Officer Rodriguez is a witness on any pending felony cases. The results of that search have been forwarded to you. If your unit does not have a computer case management system, please have your ASAs check their files and see whether they have any cases on their call where Officer Rodriguez is a witness on a pending case. If he is a witness on the case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Rodriguez's testimony you should proceed on the case.

If you have a case where we cannot proceed without Rodriguez's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Rodriguez's cases they have and how many of those cases were dismissed.

If you or your ASAs have any questions, please call me. Thank you.



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Jose Zuniga, Star # 8245

Date: October 26, 2012

Cc: Shauna Boliker, First Assistant  
Walt Hehner, Chief Deputy  
Dan Kirk, Chief of Staff  
Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau  
Jack Blakey, ASA, Chief, Special Prosecutions Bureau  
Patrick Driscoll, ASA, Chief, Civil Actions Bureau  
Tisa Morris, ASA, Chief, Juvenile Justice Bureau  
Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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As you may already know, Chicago Police Officer Jose Zuniga, Star# 8245 was charged with Forgery. MIS is conducting a search of CRIMES to determine whether Officer Zuniga is a witness on any pending felony cases. Once I have the results of that search, I will forward the results to you. If your unit does not have a computer case management system, please have your ASAs check their files and see whether they have any cases on their call where Officer Zuniga is a witness on a pending case. If he is a witness on the case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Zuniga's testimony you should proceed on the case.

If you have a case where we cannot proceed without Zuniga's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Zuniga's cases they have and how many of those cases were dismissed.

If you or your ASAs have any questions, please call me. Thank you.





**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officers Deavalin Page, Star # 15283, 4<sup>th</sup> Dist.  
Francis Zoller, Star# 8649, 4<sup>th</sup> Dist.

Date: October 29, 2012

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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As you may already know, Chicago Police Officers Deavalin Page, Star# 15283 and Francis Zoller, Star# 8649 have been charged federally with Attempted Extortion and Mail Fraud. MIS is conducting a search of CRIMES to determine whether Officers Page or Zoller are witness on any pending felony cases. Once I have the results of that search, I will forward the results to you. If your unit does not have a computer case management system, please have your ASAs check their files and see whether they have any cases on their call where either of these officers is a witness on a pending case. If either officer is a witness on the case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling either officer as a witness, please nolle the case. If the case can be proved without either officer's testimony you

should proceed on the case.

If you have a case where we cannot proceed without Officer Page's or Officer Zoller's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Page's or Officer Zoller's cases they have and how many of those cases were dismissed.

If you or your ASAs have any questions, please call me. Thank you.



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Illinois State Trooper Marco Prado

Date: November 16, 2012

Cc: Shauna Boliker, First Assistant  
Walt Hehner, Chief Deputy  
Dan Kirk, Chief of Staff  
Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau  
Jack Blakey, ASA, Chief, Special Prosecutions Bureau  
Patrick Driscoll, ASA, Chief, Civil Actions Bureau  
Tisa Morris, ASA, Chief, Juvenile Justice Bureau  
Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Illinois State Trooper Marco Prado has been charged with Aggravated Speeding under Case No. TW345886. Our office is the prosecuting authority in Trooper Prado's case. The case is currently pending at Traffic Court, Room 406, at the Daley Center and is next up on November 19, 2012. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Trooper Prado as a witness, the fact that Trooper Prado has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Trooper Prado is a witness on any pending felony cases. Once I have the results of that search, I will forward them to

each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Trooper Prado is a witness.

If you or the assistants that you supervise have a case where Trooper Prado is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Trooper Prado is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *M*

Re: Chicago Police Officer Michael Bergeson, Star# 6734, 7<sup>th</sup> District

Date: November 30, 2012

Cc: Shauna Boliker, First Assistant  
Walt Hehner, Chief Deputy  
Dan Kirk, Chief of Staff  
Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau  
Jack Blakey, ASA, Chief, Special Prosecutions Bureau  
Patrick Driscoll, ASA, Chief, Civil Actions Bureau  
Tisa Morris, ASA, Chief, Juvenile Justice Bureau  
Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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As you may already know, Chicago Police Officer Michael Bergeson, Star# 6734 was charged with the felony offenses of Leaving the scene of a Personal Injury Accident and Disorderly Conduct. MIS is conducting a search of CRIMES to determine whether Officer Bergeson is a witness on any pending felony cases. Once I have the results of that search, I will forward the results to you. If your unit does not have a computer case management system, please have your ASAs check their files and see whether they have any cases on their call where Officer Bergeson is a witness on a pending case. If he is a witness on the case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Bergeson's testimony you should proceed on the case.

If you have a case where we cannot proceed without Bergeson's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Bergeson's cases they have and how many of those cases were dismissed.

If you or your ASAs have any questions, please call me. Thank you.



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Hodges Smith, Star No. 17084

Date: February 25, 2013

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Officer Hodges C. Smith, Star# 17084 has been charged with Domestic Battery under Case No. 13DV-71026. Our office is the prosecuting authority in Officer Smith's case. The case is currently pending at Domestic Violence Court, Branch 63, at 555 W. Harrison in Chicago and is next up on March 6, 2013. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Smith as a witness, the fact that Officer Smith has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Smith is a

witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Smith is a witness.

If you or the assistants that you supervise have a case where Officer Smith is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Smith is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.





OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Anna Marie Cunningham, Star# 19833, 17<sup>th</sup> District

Date: March 22, 2013

Cc: Shauna Boliker, First Assistant  
Walt Hehner, Chief Deputy  
Dan Kirk, Chief of Staff  
Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau  
Jack Blakey, ASA, Chief, Special Prosecutions Bureau  
Patrick Driscoll, ASA, Chief, Civil Actions Bureau  
Tisa Morris, ASA, Chief, Juvenile Justice Bureau  
Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Officer Anna Marie Cunningham, Star# 19833 has been charged with DUI under Case No. TB688619. Our office is the prosecuting authority in Officer Cunningham's case. The case is currently pending at Traffic Court at the Daley Center in Chicago and is next up on March 25, 2013. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Cunningham as a witness, the fact that Officer Cunningham has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer

Cunningham is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Cunningham is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Cunningham is a witness and you determine that she is a necessary witness and needs to be called in the case, and, at the time that Officer Cunningham is testifying her case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)  
 )  
COUNTY OF COOK) SS.

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS )  
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vs ) Case No. \_\_\_\_\_  
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**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Anna Marie Cunningham, Star #19833, has been charged with DUI under Case No. TB688619. That case is next up on March 25, 2013 in Traffic Court, Daley Center, Chicago, Illinois.
2. That Officer Cunningham will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Cunningham regarding her pending case in return for her testimony in the above-captioned case.
4. That no threats have been made to Officer Cunningham regarding her pending case in return for her testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

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Assistant State's Attorney

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Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

**ANITA ALVAREZ  
STATE'S ATTORNEY**

**CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608**

**To:** All Supervisors, Criminal Prosecutions Bureau

**From:** Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

**Re:** Chicago Police John Haleas, Star# 6719, 25<sup>th</sup> District

**Date:** March 26, 2013

**Cc:** Shauna Boliker, First Assistant  
Walt Hehner, Chief Deputy  
Dan Kirk, Chief of Staff  
Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau  
Jack Blakey, ASA, Chief, Special Prosecutions Bureau  
Patrick Driscoll, ASA, Chief, Civil Actions Bureau  
Tisa Morris, ASA, Chief, Juvenile Justice Bureau  
Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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Chicago Police John Haleas, Star# 6719, 25<sup>th</sup> District has been placed on one year probation for the offense of Attempt Obstruction of Justice under Indictment No. 08CR-7115. Our office is the prosecuting authority in Officer Haleas's case.

If you or any of the assistants that you supervise have a case where you are calling Officer Haleas as a witness, the fact that Officer Haleas is currently on probation should be disclosed to the defense prior to trial as that fact would be relevant to any motive, interest or bias he may have in testifying as a witness for the State. In addition, given the nature of the conviction, we will have to disclose the information to the defense after the term of probation has expired. The MIS Department is doing a computer search to see whether Officer Haleas is a witness on any pending felony cases.

Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Haleas is a witness.

If you or the assistants that you supervise have a case where Officer Haleas is a witness and you determine that he is a necessary witness who needs to be called in the case, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

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COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY

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**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer John Haleas, Star #4462, has plead guilty and has been placed on one year probation for the offense of Attempt Obstruction of Justice, under Indictment No. 08CR-7115.
- 2.
3. That Officer Haleas will be called to testify as a witness for the prosecution in the above-captioned case.
4. That no promises of leniency or promises of any nature have been made to Officer Haleas regarding his pending case in return for his testimony in the above-captioned case.
5. That no threats have been made to Officer Haleas regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

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Assistant State's Attorney





**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Officer Juan Belmontes, Star # 8414, 7<sup>th</sup> District

Date: April 19, 2013

Cc: Shauna Boliker, First Assistant  
Walt Hehner, Chief Deputy  
Dan Kirk, Chief of Staff  
Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau  
Jack Blakey, ASA, Chief, Special Prosecutions Bureau  
Patrick Driscoll, ASA, Chief, Civil Actions Bureau  
Tisa Morris, ASA, Chief, Juvenile Justice Bureau  
Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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Chicago Police Officer Juan Belmontes, Star# 8414, 7<sup>th</sup> District has been charged with Aggravated Criminal Sexual Abuse and Unlawful Restraint. Our office is the prosecuting agency in his case. MIS is conducting a search of CRIMES to determine whether Officer Belmontes is a witness on any pending felony cases. Once I have the results of that search, I will forward the results to you. If your unit does not have a computer case management system, please have your ASAs check their files and see whether they have any cases on their call where Officer Belmontes is a witness on a pending case. If he is a witness on the case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Belmontes' testimony you should proceed on the case.

If you have a case where we cannot proceed without Belmontes' testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Belmontes' cases they have and how many of those cases were dismissed.

If you or your ASAs have any questions, please call me. Thank you.



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

**ANITA ALVAREZ  
STATE'S ATTORNEY**

**CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608**

**To:** All Supervisors, Criminal Prosecutions Bureau

**From:** Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

**Re:** Chicago Police Officer Tonacia Granado, Star# 5091

**Date:** May 16, 2013

**Cc:** Shauna Boliker, First Assistant  
Walt Hehner, Chief Deputy  
Dan Kirk, Chief of Staff  
Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau  
Jack Blakey, ASA, Chief, Special Prosecutions Bureau  
Patrick Driscoll, ASA, Chief, Civil Actions Bureau  
Tisa Morris, ASA, Chief, Juvenile Justice Bureau  
Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Officer Tonacia Granado, Star# 5091 has been charged with DUI under Case No. TE052454. Our office is the prosecuting authority in Officer Granado's case. The case is currently pending at Traffic Court at the Daley Center in Chicago and is next up on May 17, 2013. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Granado as a witness, the fact that Officer Granado has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Granado is a witness on any pending felony cases. Once I have the results of that search, I will

forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Granado is a witness.

If you or the assistants that you supervise have a case where Officer Granado is a witness and you determine that the officer is a necessary witness and needs to be called in the case, and, at the time that Officer Granado is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

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COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY :

PEOPLE OF THE STATE OF ILLINOIS )

VS

Case No. \_\_\_\_\_

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**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Tonacia Granado, Star #5091, has been charged with DUI under Case No. TE052454. That case is next up on May 17, 2013 at Traffic Court, Daley Center, Chicago, Illinois.
2. That Officer Granado will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Granado regarding the officer's pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Dunn regarding the officer's pending case in return for the officer's testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

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Assistant State's Attorney



OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Jonathan D. Stephens, Star# 8296, 2<sup>nd</sup> District

Date: June 13, 2013

Cc: Shauna Boliker, First Assistant  
Walt Hehner, Chief Deputy  
Dan Kirk, Chief of Staff  
Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau  
Jack Blakey, ASA, Chief, Special Prosecutions Bureau  
Patrick Driscoll, ASA, Chief, Civil Actions Bureau  
Tisa Morris, ASA, Chief, Juvenile Justice Bureau  
Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Officer Jonathan D. Stephens, Star# 8296, 2<sup>nd</sup> District has been charged with Domestic Battery and Assault under Case No. 13DV-73799. Our office is the prosecuting authority in Officer Stephens' case. The case is currently pending at Domestic Violence Court, Branch 60, at 555 W. Harrison in Chicago and is next up on June 21, 2013. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Stephens as a witness, the fact that Officer Stephens has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer

Stephens is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Stephens is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Stephens is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Stephens is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.



COUNTY OF COOK)

Case No. \_\_\_\_\_

## Assistant State's Attorney

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Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

**ANITA ALVAREZ  
STATE'S ATTORNEY**

**CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608**

**To:** All Supervisors, Criminal Prosecutions Bureau

**From:** Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

**Re:** Chicago Police Officer Emil Bux, Star# 10796, 15<sup>th</sup> District

**Date:** June 19, 2013

**Cc:** Shauna Boliker, First Assistant  
Walt Hehner, Chief Deputy  
Dan Kirk, Chief of Staff  
Fabio Valentini, Chief, Criminal Prosecutions Bureau  
Jack Blakey, Chief, Special Prosecutions Bureau  
Patrick Driscoll, Chief, Civil Actions Bureau  
Tisa Morris, Chief, Juvenile Justice Bureau  
Brian Sexton, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Officer Emil Bux, Star# 10796, 15<sup>th</sup> District has been charged with DUI under Case No. TB611896. Our office is the prosecuting authority in Officer Bux's case. The case is currently pending at Traffic Court, Room 405, at 555 the Daley Center in Chicago and is next up on July 1, 2013. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Bux as a witness, the fact that Officer Bux has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Bux is a witness on

any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Bux is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Bux is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Bux is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

SS.

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

VS

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## Assistant State's Attorney

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Assistant State's Attorney



OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Eric P. Brown, Star# 15575, 7<sup>th</sup> District

Date: July 17, 2013

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Officer Eric P. Brown, Star# 15572, 7th District has been charged with Domestic Battery under Case No. 13DV-81724. Our office is the prosecuting authority in Officer Brown's case. The case is currently pending at Domestic Violence Court, Branch 60, at 555 W. Harrison in Chicago and is next up on July 29, 2013. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Brown as a witness, the fact that Officer Brown has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Brown is a

witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Brown is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Brown is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Brown is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.



STATE OF ILLINOIS)  
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COUNTY OF COOK) SS.

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS )  
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 vs ) Case No. \_\_\_\_\_  
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**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Eric P. Brown, Star #15572, has been charged with Domestic Battery under Case No. 13DV-81724. That case is next up on July 29, 2013 in Branch 60, 555 W. Harrison, Chicago, Illinois.
2. That Officer Brown will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Brown regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Brown regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

\_\_\_\_\_  
Assistant State's Attorney

Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Duane Blackman, Star# 13615, 18<sup>th</sup> District

Date: December 9, 2013

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Officer Duane Blackman, Star# 13615, 18<sup>th</sup> District has been charged with Domestic Battery under Case No. 13DV-78616. Our office is the prosecuting authority in Officer Blackman's case. The case is currently pending at Domestic Violence Court, Branch 61, at 555 W. Harrison in Chicago and is next up on December 20, 2013. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Blackman as a witness, the fact that Officer Blackman has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer

Blackman is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Blackman is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Blackman is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Blackman is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

) SS.

COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS )

)  
vs )

Case No. \_\_\_\_\_

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/ )

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Duane Blackman, Star #13615, has been charged with Domestic Battery under Case No. 13DV-78616. That case is next up on December 20, 2013 in Branch 61, 555 W. Harrison, Chicago, Illinois.
2. That Officer Blackman will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Blackman regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Dunn regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

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Assistant State's Attorney

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Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

**ANITA ALVAREZ  
STATE'S ATTORNEY**

**CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608**

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau *JM*

Re: Chicago Police Officer Duane Blackman, Star# 13615, 18<sup>th</sup> District

Date: December 9, 2013

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Officer Duane Blackman, Star# 13615, 18<sup>th</sup> District has been charged with Domestic Battery under Case No. 13DV-78616. Our office is the prosecuting authority in Officer Blackman's case. The case is currently pending at Domestic Violence Court, Branch 61, at 555 W. Harrison in Chicago and is next up on December 20, 2013. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Blackman as a witness, the fact that Officer Blackman has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer

Blackman is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Blackman is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Blackman is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Blackman is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.



STATE OF ILLINOIS)  
COUNTY OF COOK)

SS.

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS       )  
                                                                )  
                    vs                                     )  
                                                                )  
                    /                                     )

Case No. \_\_\_\_\_

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Duane Blackman, Star #13615, has been charged with Domestic Battery under Case No. 13DV-78616. That case is next up on December 20, 2013 in Branch 61, 555 W. Harrison, Chicago, Illinois.
2. That Officer Blackman will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Blackman regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Dunn regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

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Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Officer James E. Heneghan, Jr., Star# 5703, 7<sup>th</sup> District

Date: February 25, 2014

Cc: Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Daniel Gallagher, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Officer James E. Heneghan, Jr., Star# 5703, 7<sup>th</sup> District has been charged with DUI under Ticket No. TB 782841. Our office is the prosecuting authority in Officer Heneghan's case. The case is currently pending at Traffic Court, at the Daley Center in Chicago and is next up on February 28, 2014. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Heneghan as a witness, the fact that Officer Heneghan has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer

Heneghan is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Heneghan is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Heneghan is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Heneghan is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)  
COUNTY OF COOK)

SS.

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS )  
 )  
 vs ) Case No. \_\_\_\_\_  
 )  
 / )

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer James E. Heneghan, Jr., Star #5703, has been charged with DUI under Ticket No. TB 782841. That case is next up on February 28, 2014 in Traffic Court at the Daley Center, Chicago, Illinois.
2. That Officer Heneghan will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Heneghan regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Heneghan regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

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Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Officer Emil Bux, Star# 10796, 15<sup>th</sup> District

Date: March 17, 2014

Cc: Shauna Boliker, First Assistant  
Walt Hehner, Chief Deputy  
Dan Kirk, Chief of Staff  
Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau  
Jack Blakey, ASA, Chief, Special Prosecutions Bureau  
Daniel Gallagher, ASA, Chief, Civil Actions Bureau  
Tisa Morris, ASA, Chief, Juvenile Justice Bureau  
Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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On March 5, 2014 Chicago Police Officer Emil Bux, Star# 10796, 15<sup>th</sup> District was placed on eighteen months court supervision for the misdemeanor offense of DUI under Ticket No. TB611896. That supervision is set to terminate on September 4, 2015.

If you or any of the assistants that you supervise have a case where we are calling Officer Bux as a witness, the fact that Officer Bux is currently on court supervision should be disclosed to the defense prior to trial as that fact would be relevant to any motive, interest or bias he may have in testifying as a witness for the State. If you determine that he is a necessary witness who needs to be called in the case, and, at the time of his testimony Officer Bux is still on court supervision, please file and tender to the defense the attached updated Notice of Disclosure prior to trial. None of the

ASAs that you supervise are to file the notice without your prior knowledge and approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.



STATE OF ILLINOIS)  
 )  
COUNTY OF COOK) SS.

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS )  
 )  
vs ) Case No. \_\_\_\_\_  
 )  
/ )

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That on March 5, 2014 Chicago Police Officer Emil Bux, Star #10796, was been placed on eighteen months court supervision for the misdemeanor offense of DUI under Case No. TB611896. That supervision is set to terminate on September 4, 2015.
2. That Officer Bux will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Bux regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Bux regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

\_\_\_\_\_  
Assistant State's Attorney

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Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

**ANITA ALVAREZ  
STATE'S ATTORNEY**

**CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608**

**To:** All Supervisors, Criminal Prosecutions Bureau

**From:** Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

**Re:** Chicago Police Officer Emil Bux, Star# 10796, 15<sup>th</sup> District

**Date:** March 17, 2014

**Cc:** Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Daniel Gallagher, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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On March 5, 2014 Chicago Police Officer Emil Bux, Star# 10796, 15<sup>th</sup> District was placed on eighteen months court supervision for the misdemeanor offense of DUI under Ticket No. TB611896. That supervision is set to terminate on September 4, 2015.

If you or any of the assistants that you supervise have a case where you are calling Officer Bux as a witness, the fact that Officer Bux is currently on court supervision should be disclosed to the defense prior to trial as that fact would be relevant to any motive, interest or bias he may have in testifying as a witness for the State. If you determine that he is a necessary witness who needs to be called in the case, and, at the time of his testimony Officer Bux is still on court supervision, please file and tender to the defense the attached updated Notice of Disclosure prior to trial. None of the

ASAs that you supervise are to file the notice without your prior knowledge and approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)                SS.  
COUNTY OF COOK)

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IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS )  
 )  
 vs ) Case No. \_\_\_\_\_  
 )  
 / )

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That on March 5, 2014 Chicago Police Officer Emil Bux, Star #10796, was been placed on eighteen months court supervision for the misdemeanor offense of DUI under Case No. TB611896. That supervision is set to terminate on September 4, 2015.
2. That Officer Bux will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Bux regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Bux regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

**ANITA ALVAREZ  
STATE'S ATTORNEY**

**CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608**

**To:** All Supervisors, Criminal Prosecutions Bureau

**From:** Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

**Re:** Chicago Police Sgt. Jay Padar, Star# 1210  
Chicago Police Officer William Prunte, Star# 16114  
Chicago Police Officer Vince Morgan, Star# 5198  
Glenview Police Sgt. Theresa Urbanowski  
Glenview Police Officer James Horn

**Date:** April 14, 2014

**Cc:** Shauna Boliker, First Assistant  
  
Walt Hehner, Chief Deputy  
  
Dan Kirk, Chief of Staff  
  
Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau  
  
Jack Blakey, ASA, Chief, Special Prosecutions Bureau  
  
Daniel Gallagher, ASA, Chief, Civil Actions Bureau  
  
Tisa Morris, ASA, Chief, Juvenile Justice Bureau  
  
Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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Please have the ASAs that you supervise check their files to determine whether any of the following officers are witnesses on any pending cases: Chicago Police Sgt. Jay Padar, Star# 1210, Chicago Police Officer William Prunte, Star# 16114, Chicago Police Officer Vince Morgan, Star# 5198, Glenview Police Sgt. Theresa Urbanowski and Glenview Police Officer James Horn.

In addition to the ASA search, MIS is conducting a search of CRIMES to determine whether

any of these officers is a witness on any pending felony cases. Once I have the results of that search, I will forward the results to you.

If any of the officers is a witness on the case please determine whether the case can be proved without calling the officer as a witness. If the case cannot be proved without calling the officer as a witness, please nolle the case. If the case can be proved without the testimony of any of the officers, you should proceed on the case.

If you have a case where we cannot proceed without any of the officer's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of these cases they have and how many of those cases were dismissed.

If you or your ASAs have any questions, please call me. Thank you.





**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re: Cook County Sheriff's Police Officers Rivlin, Star #629 and Valdes, Star #258

Date: May 16, 2014

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Daniel Gallagher, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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Please let me know whether you or the ASAs that you supervise have any cases where Cook County Sheriff's Police Officers Rivlin, Star #629 or Valdes, Star #258 are witnesses. Regarding felony cases, MIS is conducting a search of CRIMES to determine whether either officer is a witness on any pending felony cases. Once I have the results of that search, I will forward the results to you. If your unit does not have a computer case management system, please have your ASAs check their files and see whether they have any cases on their call where the officers are witnesses on a pending case

If you or your ASAs have any questions, please call me. Thank you.



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

**ANITA ALVAREZ  
STATE'S ATTORNEY**

**CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608**

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Brian Yaverski, Star 20483, Area South

Date: September 22, 2014

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Jack Blakey, Chief, Special Prosecutions Bureau

Daniel Gallagher, Chief, Civil Actions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

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Chicago Police Detective Brian Yaverski, Star# 20483, Area South has been charged with Domestic Battery under Case No. 14 DV 76500. Our office is the prosecuting authority in Detective Yaverski's case. The case is currently pending in Branch 62 at 555 West Harrison Street in Chicago and is next up on October 3, 2014. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Detective Yaverski as a witness, the fact that Detective Yaverski has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Detective Yaverski is a witness on any pending felony cases. Once I have the results of that search, I will

forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Detective Yaverski is a witness on any pending cases.

If you or the assistants that you supervise have a case where Detective Yaverski is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Detective Yaverski is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

SS.

COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS )

VS

Case No. \_\_\_\_\_

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Detective Brian Yaverski, Star #20483, has been charged with Domestic Battery under Case No. 14 DV 76500. That case is next up on October 3, 2014 in Branch 62, 555 W. Harrison, Chicago, Illinois.
2. That Detective Yaverski will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Detective Yaverski regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Detective Yaverski regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Brian Yaverski, Star 20483, Area South

Date: September 22, 2014

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Jack Blakey, Chief, Special Prosecutions Bureau

Daniel Gallagher, Chief, Civil Actions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

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Chicago Police Detective Brian Yaverski, Star# 20483, Area South has been charged with Domestic Battery under Case No. 14 DV 76500. Our office is the prosecuting authority in Detective Yaverski's case. The case is currently pending in Branch 62 at 555 West Harrison Street in Chicago and is next up on October 3, 2014. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Detective Yaverski as a witness, the fact that Detective Yaverski has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Detective Yaverski is a witness on any pending felony cases. Once I have the results of that search, I will

forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Detective Yaverski is a witness on any pending cases.

If you or the assistants that you supervise have a case where Detective Yaverski is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Detective Yaverski is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

COUNTY OF COOK)

COUNTY DEPARTMENT, CRIMINAL DIVISION

)

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Detective Brian Yaverski, Star #20483, has been charged with Domestic Battery under Case No. 14 DV 76500. That case is next up on October 3, 2014 in Branch 62, 555 W. Harrison, Chicago, Illinois.
2. That Detective Yaverski will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Detective Yaverski regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Detective Yaverski regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney



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Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Officer Danny Sevilla, Star# 13761, 4<sup>th</sup> District

Date: November 5, 2014

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Daniel Gallagher, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Officer Danny Sevilla, Star# 13761, 4<sup>th</sup> District has been charged with DUI. Our office is the prosecuting authority in Officer Sevilla's case. The case is currently pending at Traffic Court, at the Daley Center in Chicago and is next up on November 6, 2014. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Sevilla as a witness, the fact that Officer Sevilla has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Sevilla is a witness on any pending felony cases. Once I have the results of that search, I will forward them to

each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Sevilla is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Sevilla is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Sevilla is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)  
COUNTY OF COOK)

SS.

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS )

vs )

/ )

Case No. \_\_\_\_\_

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Danny Sevilla, Star #13761, has been charged with DUI. That case is next up on November 6, 2014 in Room 408, Traffic Court, Daley Center, Chicago, Illinois.
2. That Officer Sevilla will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Sevilla regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Sevilla regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

\_\_\_\_\_  
Assistant State's Attorney

Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

**ANITA ALVAREZ  
STATE'S ATTORNEY**

**CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608**

**To:** All Supervisors, Criminal Prosecutions Bureau

**From:** Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

**Re:** Cook County Sheriff's Police Officer Robert Vaughan

**Date:** November 5, 2014

**Cc:** Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrsoe, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Jack Blakey, Chief, Special Prosecutions Bureau

Daniel Gallagher, Chief, Civil Actions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

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As you may already know, Cook County Sheriff's Police Officer Robert Vaughan has been charged several federal felony offenses. MIS is conducting a search of CRIMES to determine whether Officer Vaughan is a witness on any pending felony cases. Once I have the results of that search, I will forward the results to you. If your unit does not have a computer case management system, please have your ASAs check their files and see whether they have any cases on their call where Officer Vaughan is a witness on a pending case. If he is a witness on the case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Vaughan's testimony you should proceed on the case.

If you have a case where we cannot proceed without Vaughan's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Vaughan's cases they have and how many of those cases were dismissed.

If you or your ASAs have any questions, please call me. Thank you.



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Officer Aldo Brown, Star #13838, 4<sup>th</sup> District

Date: November 24, 2014

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrsoe, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Jack Blakey, Chief, Special Prosecutions Bureau

Daniel Gallagher, Chief, Civil Actions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

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As you may already know, Chicago Police Officer Aldo Brown has been charged with federal felony offenses. MIS is conducting a search of CRIMES to determine whether Officer Brown is a witness on any pending felony cases. Once I have the results of that search, I will forward the results to you. If your unit does not have a computer case management system, please have your ASAs check their files and see whether they have any cases on their call where Officer Brown is a witness on a pending case. If he is a witness on the case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Brown's testimony you should proceed on the case.



If you have a case where we cannot proceed without Brown's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Brown's cases they have and how many of those cases were dismissed.

If you or your ASAs have any questions, please call me. Thank you.



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Officer Rudolph Garza, Star# 8667, 8<sup>th</sup> District

Date: November 24, 2014

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Jack Blakey, Chief, Special Prosecutions Bureau

Daniel Gallagher, Chief, Civil Actions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Officer Rudolph Garza, Star# 8667, 8<sup>th</sup> District has been charged with DUI under Ticket No. TH 254583. Our office is the prosecuting authority in Officer Garza's case. The case is currently pending at Traffic Court, at the Daley Center in Chicago and is next up on December 9, 2014. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Garza as a witness, the fact that Officer Garza has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Garza is a

witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Garza is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Garza is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Garza is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

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COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY

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**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Rudolph Garza, Star #8667, has been charged with DUI. That case is next up on December 8, 2014 in Room 406, Traffic Court, Daley Center, Chicago, Illinois.
2. That Officer Garza will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Garza regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Garza regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

**ANITA ALVAREZ  
STATE'S ATTORNEY**

**CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608**

**To:** All Supervisors, Criminal Prosecutions Bureau

**From:** Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

**Re:** Chicago Police Officer Herbert Brown, Star# 2404, 5<sup>th</sup> District

**Date:** December 3, 2014

**Cc:** Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Jack Blakey, Chief, Special Prosecutions Bureau

Daniel Gallagher, Chief, Civil Actions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Officer Herbert Brown, Star# 2404, 5<sup>th</sup> District has been charged with Domestic Battery under No. 14 DV 81024. Our office is the prosecuting authority in Officer Brown's case. The case is currently pending in Branch 60, at 555 West Harrison and is next up on December 14, 2014. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Brown as a witness, the fact that Officer Brown has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Brown is a witness on any pending felony cases. Once I have the results of that search, I will forward them to

each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Brown is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Brown is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Brown is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Officer Jesus Vela, Star# 5566, 22<sup>nd</sup> District

Date: April 1, 2015

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Daniel Gallagher, Chief, Civil Actions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Officer Jesus Vela, Star# 5566, 22<sup>nd</sup> District has been charged with Domestic Battery under Case No. 15DV-71910. Our office is the prosecuting authority in Officer Vela's case. The case is currently pending in Branch 60 at 555 West Harrison in Chicago and is next up on April 14, 2015. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Vela as a witness, the fact that Officer Vela has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Vela is a witness on



any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Vela is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Vela is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Vela is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)                   SS.  
                              )  
COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS       )  
                                                                )  
                    vs                                     )  
                                                                )  
                    /                                     )

Case No. \_\_\_\_\_

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Jesus Vela, Star #5566, has been charged with Domestic Battery. That case is next up on April 14, 2015 in Branch 60, 555 West Harrison Street, Chicago, Illinois.
2. That Officer Vela will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Vela regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Vela regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

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Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Board Findings of Rule 14 Violations

Date: April 22, 2015

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Daniel Gallagher, Chief, Civil Actions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

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The office has received notice of fifteen cases where the Chicago Police Board issued Findings and Decisions wherein fifteen officers were found to have violated Chicago Police Department Rule 14-Making a false report, written or oral. In each of those fifteen cases, the Chicago Police Department sought the officer's termination. In thirteen of those cases the Police Board imposed a penalty of less than termination. In the two remaining cases, the Police Board recommended termination but the Circuit Court of Cook County remanded the cases for the Police Board to impose a less severe sanction. The fifteen officers are:

Audrey Wilson, Star 9116  
Nenad Markovich, Star 19638

John Loconsole, Star 6293  
Dean Gleason, Star 2054  
Eddie Yoshimura, Star 2334  
Anthony Ceja, Star 672  
Christopher Traynor, Star 8903  
John Catanzara, Star 3572  
Jesse Terrazas, Star 1539  
Alejandro De La Cruz, Star 18959  
Daniel Gomez, Star 19539  
Salvador Prieto, Star 11710  
Marvin Bonds, Star 14798  
Gonzalo Escobar, Star 15824  
Christopher Moore, Star 14830  
Calvin Chatman, Star 5532  
Carl Belaschky, Star 11814  
Slawomir Plewa, Star 14604

As you are well aware, pursuant to Brady v. Maryland, 373 US 83 (1963), the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. Giglio v. United States, 405 U.S. 150, 154 (1972). The Police Board's findings fall squarely under the type of disclosure required under Giglio.

If you or any of the assistants that you supervise have a case where any of these officers are listed as a potential witness on our answer to discovery, the findings of the Police Board must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether any of these officers is a witness on any pending felony cases. Once I have the results of those searches, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether any of these officers is a witness on any pending cases.

If you or the assistants that you supervise have a case where any of the above officers is listed as a witness, please tender to the defense the attached Notice of Disclosure prior to trial. The Board's written findings are on the "L" Drive in a folder titled "Rule 14 Findings". These are to be tendered to the defense as well. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

Also please remind your ASAs that the mere fact that this Giglio material is discoverable and has been tendered to the defense does not in and of itself mean that the defense can introduce the evidence at trial or cross-examine any of the officers on the material. The ASAs should, in the appropriate cases, file all necessary motions to preclude the use of the Giglio material at trial.

The case law in this area is, of course, set out in United States v. Brady, 373 U.S. 83 (1963) and Giglio v. United States, 405 U.S. 150 (1972). The timing of disclosure is governed by Weatherford v. Bursey, 429 U.S. 545 (1997). What needs to be disclosed is discussed in United States v. Agurs, 427 U.S. 97 (1976); United States v. Diaz, 922 F.2d (2<sup>nd</sup> Cir. 1990); United States v.

Veras, 51 F.3d 1365 (7<sup>th</sup> Cir. 1995) and United States v. Kiszewski, 877 F.2d 210 (2<sup>nd</sup> Cir. 1989). Limiting the use of this type of information is discussed in People v. Driskell, 213 Ill.App.3d 196 (4<sup>th</sup> Dist. 1991) and People v. Fonza, 217 Ill.App.3d 883, 892 (1st Dist. 1991).

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)  
COUNTY OF COOK)

SS.

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS

VS

Case No. \_\_\_\_\_

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That on ///// the Chicago Police Board found Chicago Police Officer ///, Star #///, in violation of Chicago Police Department Rule 14-Making a false report, written or oral.
2. That Officer ///// is listed as a witness for the prosecution in the above-captioned case.
3. A copy of the Police Board's finding is attached to this Notice.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Officer Roy Beard, Star# 17740, 6<sup>th</sup> District

Date: May 8, 2015

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Daniel Gallagher, Chief, Civil Actions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Officer Roy Beard, Star# 17740, 6<sup>th</sup> District has been charged with Domestic Battery under Case No. 15DV-72443. Our office is the prosecuting authority in Officer Beard's case. The case is currently pending in Branch 60 at 555 West Harrison in Chicago and is next up on June 4, 2015. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Beard as a witness, the fact that Officer Beard has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Beard is a



witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Beard is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Beard is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Beard is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)  
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COUNTY OF COOK) SS.

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS )  
 )  
vs ) Case No. \_\_\_\_\_  
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**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Roy Beard, Star #17740, has been charged with Domestic Battery. That case is next up on June 4, 2015 in Branch 60, 555 W. Harrison Street, Chicago, Illinois.
2. That Officer Beard will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Beard regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Beard regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

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Assistant State's Attorney

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Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

**ANITA ALVAREZ  
STATE'S ATTORNEY**

**CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608**

**To:** All Supervisors, Criminal Prosecutions Bureau

**From:** Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

**Re:** Chicago Police Officer Thomas McMillion, Star# 4174, 25<sup>th</sup> District

**Date:** July 27, 2015

**Cc:** Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Daniel Gallagher, Chief, Civil Actions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Officer Thomas McMillion, Star# 4174, 25<sup>th</sup> District has been charged with DUI under Ticket No. TH297383. Our office is the prosecuting authority in Officer McMillion's case. The case is currently pending in Traffic Court at the Daley Center in Chicago and is next up on August 3, 2015. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer McMillion as a witness, the fact that Officer McMillion has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer

McMillion is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer McMillion is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer McMillion is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer McMillion is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)  
COUNTY OF COOK)

SS.

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS )

VS

Case No. \_\_\_\_\_

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Thomas McMillion, Star #4174, has been charged with DUI. That case is next up on August 3, 2015 in Room 404, Traffic Court, Daley Center, Chicago, Illinois.
2. That Officer McMillion will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer McMillion regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer McMillion regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

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Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Detective Terrance Nalls, Star# 20797, Unit 620

Date: December 21, 2015

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Donald Pechous. Acting Chief, Civil Actions Bureau

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It has been brought to the office's attention that Chicago Police Detective Terrance Nalls, Star# 20797, Unit 620 has been charged with Domestic Battery under Case No. 15DV51206. Our office is the prosecuting authority in Detective Nalls' case. The case is currently pending in Room 204 in Bridgeview and is next up on December 31, 2015. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Detective Nalls as a witness, the fact that Detective Nalls has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Detective Nalls is a witness on any pending felony cases. Once I have the results of that search, I will forward them to



each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Detective Nalls is a witness on any pending cases.

If you or the assistants that you supervise have a case where Detective Nalls is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Detective Nalls is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

SS.

COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS )

Case No. \_\_\_\_\_

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**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Detective Terrance Nalls, Star# 20797 has been charged with Domestic Battery. That case is next up December 31, 2015 in Room 204 in Bridgeview.
2. That Detective Nalls will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Detective Nalls regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Detective Nalls regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

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Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Potential Giglio material regarding Chicago Police Officer Damon Balesteri, Star# 7510

Date: May 19, 2016

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrsoe, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous, Acting Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

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On February 16, 2016 The Honorable Judge Steven Watkins, in the case of The People of The State of Illinois v. Stephon Mack, 15MC1-218194, made findings regarding the credibility of Chicago Police Officer Damon Balesteri, Star# 7510 that may impact his credibility should he testify in court in the future. A copy of Judge Watkins' findings is attached to this memo.

Pursuant to Brady v. Maryland, 373 US 83 (1963), the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. Giglio v. United States, 405 U.S. 150, 154 (1972). Judge Watkins' findings regarding Officer Balesteri's testimony could potentially

be found to be the type of information required to be disclosed under Giglio.

Given this possibility, if you or any of the assistants that you supervise have a case where Officer Balesteri is listed as a potential witness on our answer to discovery, Judge Watkins' finding is to be disclosed to the defense prior to trial. The MIS Department is doing a computer search to determine whether Officer Balesteri is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS and have another list run. In addition, MIS has been instructed to flag Officer Balesteri's name in CRIMES to alert ASAs that a notice of disclosure is required in the case. Units that do not have a computer case management system will have to check their files to determine whether Officer Balesteri is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Balesteri is listed as a witness, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your knowledge. An electronic copy of the notice will be sent to you.

Also please remind your ASAs that the mere fact that this possible Giglio material is discoverable and has been tendered to the defense does not in and of itself mean that the defense can introduce the evidence at trial or cross-examine Officer Balesteri regarding the material. The ASAs should, in the appropriate cases, file all necessary motions to seek a judicial determination as to whether this information is Giglio material and, if so, whether the material is relevant and admissible at any trial or hearing where Officer Balesteri is going to be called as a witness.

In general, the case law in this area is, of course, set out in United States v. Brady, 373 U.S. 83 (1963) and Giglio v. United States, 405 U.S. 150 (1972). The timing of disclosure is governed by Weatherford v. Bursey, 429 U.S. 545 (1997). What needs to be disclosed is discussed in United States v. Agurs, 427 U.S. 97 (1976); United States v. Diaz, 922 F.2d (2<sup>nd</sup> Cir. 1990); United States v. Veras, 51 F.3d 1365 (7<sup>th</sup> Cir. 1995) and United States v. Kiszewski, 877 F.2d 210 (2<sup>nd</sup> Cir. 1989). Limiting the use of this type of information is discussed in People v. Driskell, 213 Ill.App.3d 196 (4<sup>th</sup> Dist. 1991) and People v. Fonza, 217 Ill.App.3d 883, 892 (1st Dist. 1991).





**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Officer Leticia Kaner, Star# 6143, Unit 059

Date: July 21, 2015

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Daniel Gallagher, Chief, Civil Actions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Officer Leticia Kaner, Star# 6143, Unit 059 has been charged with Domestic Battery. Our office is the prosecuting authority in Officer Kaner's case. The case is currently pending in Skokie and is next up on August 4, 2015. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Kaner as a witness, the fact that Officer Kaner has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Kaner is a witness on any pending felony cases. Once I have the results of that search, I will forward them to

each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Kaner is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Kaner is a witness and you determine that she is a necessary witness and needs to be called in the case, and, at the time that Officer Kaner is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.



STATE OF ILLINOIS)

SS.

COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS )

VS

Case No. \_\_\_\_\_

/

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Leticia Kaner, Star #6143, has been charged with Domestic Battery. That case is next up on August 4, 2015 in Skokie.
2. That Officer Kaner will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Kaner regarding her pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Kaner regarding her pending case in return for her testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Cook County Forest Preserve Police Officer Joe Gotch

Date: July 21, 2015

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrsoe, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Daniel Gallagher, Chief, Civil Actions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

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Cook County Forest Preserve Police Officer Joe Gotch has been charged with felony Criminal Damage to Property under indictment number 15CR-10152. MIS is conducting a search of CRIMES to determine whether Officer Gotch is a witness on any pending felony cases. Once I have the results of that search, I will forward the results to you. If your unit does not have a computer case management system, please have your ASAs check their files and see whether they have any cases on their call where Officer Gotch is a witness on a pending case. If he is a witness on the case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Gotch's testimony you should proceed on the case.

If you have a case where we cannot proceed without Gotch's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Gotch's cases they have and how many of those cases were dismissed.

If you or your ASAs have any questions, please call me. Thank you.



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Officer Thomas McMillion, Star# 4174, 25<sup>th</sup> District

Date: July 27, 2015

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Daniel Gallagher, Chief, Civil Actions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Officer Thomas McMillion, Star# 4174, 25<sup>th</sup> District has been charged with DUI under Ticket No. TH297383. Our office is the prosecuting authority in Officer McMillion's case. The case is currently pending in Traffic Court at the Daley Center in Chicago and is next up on August 3, 2015. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer McMillion as a witness, the fact that Officer McMillion has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer

McMillion is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer McMillion is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer McMillion is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer McMillion is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

) SS.

COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS )

vs )

/ )

Case No. \_\_\_\_\_

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Thomas McMillion, Star #4174, has been charged with DUI. That case is next up on August 3, 2015 in Room 404, Traffic Court, Daley Center, Chicago, Illinois.
2. That Officer McMillion will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer McMillion regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer McMillion regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

\_\_\_\_\_  
Assistant State's Attorney

Assistant State's Attorney





**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Officer Wayne Rydberg, Star# 13986, 5<sup>th</sup> District

Date: September 9, 2015

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Daniel Gallagher, Chief, Civil Actions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Officer Wayne Rydberg, Star# 13986, 5<sup>th</sup> District has been charged with Domestic Battery under Case No. 15DV-76331. Our office is the prosecuting authority in Officer Rydberg's case. The case is currently pending in Branch 61 at 555 West Harrison in Chicago and is next up on October 4, 2015. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Rydberg as a witness, the fact that Officer Rydberg has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer

Rydberg is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Rydberg is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Rydberg is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Rydberg is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

SS.

COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS )

VS

Case No. \_\_\_\_\_

1

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Wayne Rydberg, Star #13986, has been charged with Domestic Battery. That case is next up on October 7, 2015 in Branch 61, 555 W. Harrison, Chicago, Illinois.
2. That Officer Rydberg will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Rydberg regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Rydberg regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

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Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Officer Lashawn Taylor Star# 5523, 7<sup>th</sup> District

Date: November 19, 2015

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Donald Pechous, Deputy Chief, Civil Actions Bureau

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It has been brought to the office's attention that Chicago Police Officer Lashawn Taylor, Star# 5523, 7<sup>th</sup> District has been charged with Domestic Battery under Case No. 15DV-79507. Our office is the prosecuting authority in Officer Taylor's case. The case is currently pending in Branch 62 at 555 West Harrison in Chicago and is next up on December 2, 2015. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Taylor as a witness, the fact that Officer Taylor has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Taylor is a

witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Taylor is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Taylor is a witness and you determine that she is a necessary witness and needs to be called in the case, and, at the time that Officer Taylor is testifying her case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

SS.

COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY

PEOPLE OF THE STATE OF ILLINOIS )

VS

Case No. \_\_\_\_\_

/

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Lashawn Taylor, Star #5533, has been charged with Domestic Battery. That case is next up on December 2, 2015 in Branch 62, 555 West Harrison, Chicago, Illinois.
2. That Officer Taylor will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Taylor regarding her pending case in return for her testimony in the above-captioned case.
4. That no threats have been made to Officer Taylor regarding her pending case in return for her testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

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Assistant State's Attorney





**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Officer Vincent Escamilla, Star# 16095, 19<sup>th</sup> District

Date: December 14, 2015

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Don Pechous, Acting Chief, Civil Actions Bureau

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It has been brought to the office's attention that Chicago Police Officer Vincent Escamilla, Star# 16095, 19<sup>th</sup> District has been charged with Leaving the Scene of a Property Damage Accident under Case No. YB580455. Our office is the prosecuting authority in Officer Escamilla's case. The case is currently pending in Room 208 in Bridgeview and is next up on December 29, 2015. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Escamilla as a witness, the fact that Officer Escamilla has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer

Escamilla is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Escamilla is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Escamilla is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Escamilla is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

SS.

COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS )

VS

Case No. \_\_\_\_\_

1

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Vincent Escamilla, Star #16095, has been charged with Leaving the Scene of a Property Damage Accident. That case is next up on December 29, 2015 in Room 208 in Bridgeview
2. That Officer Escamilla will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Escamilla regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Escamilla regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

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Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Detective Michael Qualls, Star# 20791

Date: December 16, 2015

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrsoe, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Donald Pechous, Acting Chief, Civil Actions Bureau

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The office has been made aware that Chicago Police Detective Michael Qualls, Star# 20791 has stated that in the past, in order to assist him in preparing his police reports, he has audio recorded interviews that he conducted as part of his investigations in some of his cases. Detective Qualls produced the phone that he used for these recordings for forensic investigation and it was determined that the phone contained four recordings of interviews. It was further determined that only one case was involved in the recordings. The issues in that one case are currently being addressed.

Notwithstanding that only one case was involved, in any case where we list Detective Qualls as a witness on our answer to discovery, please have the ASAs file the attached notice of disclosure. MIS has prepared a list of active cases where Detective Qualls is listed as a participant and that list is attached as well. Units without a case management system should check their files to determine

whether Detective Qualls is listed as a witness.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

SS.

1

IN THE CIRCUIT COURT OF COOK COUNTY

PEOPLE OF THE STATE OF ILLINOIS )

VS

Case No. \_\_\_\_\_

/

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Detective Michael Qualls, Star 20791, has stated that he has previously audio recorded interviews with his cellular telephone to assist him in generating police reports.
2. That Detective Qualls produced his cellular telephone for forensic analysis.
3. That Detective Qualls' cellular telephone was forensically examined and was found to contain four recordings of interviews.
4. That none of these recordings were of interviews of anyone involved in this criminal case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Officer Robert Stegmiller, Star# 18764, Unit 311

Date: December 17, 2015

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Donald Pechous, Acting Chief, Civil Actions Bureau

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It has been brought to the office's attention that Chicago Police Officer Robert Stegmiller, Star# 18764, Unit 311 has been charged with Retail Theft under Case No. 155005321. Our office is the prosecuting authority in Officer Stegmiller's case. The case is currently pending in Room 102 in Bridgeview and is next up on January 26, 2016. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Stegmiller as a witness, the fact that Officer Stegmiller has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Stegmiller is a witness on any pending felony cases. Once I have the results of that search, I will



forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Stegmiller is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Stegmiller is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Stegmiller is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

SS.

COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY

PEOPLE OF THE STATE OF ILLINOIS )

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## **NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Robert Stegmiller, Star #18764, has been charged with Retail Theft. That case is next up on January 26, 2016 in Room 102, in Bridgeview.
2. That Officer Stegmiller will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Stegmiller regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Stegmiller regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

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Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Giglio material regarding Chicago Police Sergeant Brian Johnson, Star No. 1306

Date: January 29, 2016

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrsoe, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous, Acting Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

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The Honorable Judge James Obbish, in the case of The People of The State of Illinois v. Princeton Williamson, 14CR-1872, has made findings regarding the credibility of Chicago Police Sergeant Brian Johnson, Star No. 1306 which impact his credibility should he testify in court in the future.

Pursuant to Brady v. Maryland, 373 US 83 (1963), the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. Giglio v. United States, 405 U.S. 150, 154 (1972).

In light of the existing case law, Judge Obbish's findings regarding Sergeant Johnson are Giglio material as "impeachment of a witness can make the difference between acquittal and conviction...where credibility is the central issue in the case and the evidence presented at trial consists of opposing stories presented by the defendant and government agents." United States v. Kiszewski, 877 F.2d 210, 216 (2<sup>nd</sup> Cir. 1985).

I have attached a Notice of Disclosure, as well the transcript of Judge Obbish's findings that is to be filed with the court and tendered to the defense in all cases where Sergeant Johnson is going to be called as witnesses. The MIS Department has run a search to determine whether Sergeant Johnson is a witness on any pending cases and the results of that search are attached. Please note that prior to being promoted to Sergeant; Sergeant Johnson was a detective with a star number of 20948. Units without an automated case management system will have to search their files to determine whether Sergeant Johnson is a witness on any pending case. In addition, cases in CRIMES where Sergeant Johnson has been listed as a participant will be flagged in order to remind the ASAs of the need to make this disclosure.

Also please remind your ASAs that the mere fact that this Giglio material is discoverable and has been tendered to the defense does not in and of itself mean that the defense can introduce the evidence at trial or cross-examine Sergeant Johnson on the material. The ASAs should, in the appropriate cases, file all necessary motions to preclude the use of the Giglio material at trial.

The case law in this area is, of course, set out in United States v. Brady, 373 U.S. 83 (1963) and Giglio v. United States, 405 U.S. 150 (1972). The timing of disclosure is governed by Weatherford v. Bursey, 429 U.S. 545 (1977). What needs to be disclosed is discussed in United States v. Agurs, 427 U.S. 97 (1976); United States v. Diaz, 922 F.2d (2<sup>nd</sup> Cir. 1990); United States v. Veras, 51 F.3d 1365 (7<sup>th</sup> Cir. 1995) and United States v. Kiszewski, 877 F.2d 210 (2<sup>nd</sup> Cir. 1989). Limiting the use of this type of information is discussed in People v. Driskell, 213 Ill.App.3d 196 (4<sup>th</sup> Dist. 1991) and People v. Fonza, 217 Ill.App.3d 883, 892 (1st Dist. 1991).

STATE OF ILLINOIS)

SS.

COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY

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**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. Judge James Obbish, in the case of The People of the State of Illinois v. Princeton Williamson, Indictment No. 14CR-1872 made findings regarding the testimony of Chicago Police Sergeant Brian Johnson, Star No. 1306 that may impact his credibility should he testify in court in the future.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Officer Erin Mowry, Star #12708, 25<sup>th</sup> District

Date: February 3, 2016

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Donald Pechous, Acting Chief, Civil Actions Bureau

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Chicago Police Officer Erin Mowry, Star# 12708, 25<sup>th</sup> District has been charged with Aggravated DUI under Case No. 15CR-13401. Our office is the prosecuting authority in Officer Mowry's case. The case is currently pending in front of the Honorable Judge Timothy Joyce in Room 208 at 26<sup>th</sup> Street and is next up on February 24, 2016. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Mowry as a witness, the fact that Officer Mowry has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Mowry is a witness on any pending felony cases. Once I have the results of that search, I will forward them to

each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Mowry is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Mowry is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Mowry is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.



STATE OF ILLINOIS)

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SS.

COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY

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**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Erin Mowry, Star #12708, has been charged with Aggravated DUI. That case is next up on February 24, 2016 in Room 208, Criminal Court, 2600 S. California Ave., Chicago.
- 2.
3. That Officer Mowry will be called to testify as a witness for the prosecution in the above-captioned case.
4. That no promises of leniency or promises of any nature have been made to Officer Mowry regarding his pending case in return for his testimony in the above-captioned case.
5. That no threats have been made to Officer Mowry regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

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Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Officer Ediberto Diaz, Star# 10299, 7<sup>th</sup> District

Date: March 3, 2016

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Donald Pechous, Acting Chief, Civil Actions Bureau

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Chicago Police Officer Ediberto Diaz, Star# 10299, 7<sup>th</sup> District has been charged with Reckless Discharge of a Firearm. Our office is the prosecuting authority in Officer Diaz's case. The case is currently pending in Maywood and is next up on March 18, 2016. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Diaz as a witness, the fact that Officer Diaz has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Diaz is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you.

Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Diaz is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Diaz is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Diaz is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

**SS.**

COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY

PEOPLE OF THE STATE OF ILLINOIS )

VS

Case No. \_\_\_\_\_

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**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Ediberto Diaz, Star #110299, has been charged with Reckless Discharge of a Firearm. That case is next up on March 18, 2016 in Maywood, Illinois.
2. That Officer Diaz will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Diaz regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Diaz regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

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Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Officer Wayne Rydberg, Star# 13986, 5<sup>th</sup> District

Date: March 14, 2016

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Donald Pechous, Acting Chief, Civil Actions Bureau

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It has been brought to the office's attention that Chicago Police Officer Wayne Rydberg, Star# 13986, 5<sup>th</sup> District has been charged in two Domestic Battery cases under Case Nos. 16 DV-07029 and 16 DV-71442. He has also been charged with Battery under Case No. 16-1194690. Our office is the prosecuting authority in each of Officer Rydberg's cases. Case 16 DV-07029 is currently pending in Branch 64 at 555 West Harrison in Chicago and is next up on March 14, 2016 and case 16 DV-71442 is currently pending in Branch 62 at 555 West Harrison in Chicago and is next up on March 24, 2016. The battery case, 16-1194690 is pending in Branch 35 on March 25, 2016. As you are all well aware, the fact that any witness that we are calling to testify has pending criminal cases must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Rydberg as a witness, the fact that Officer Rydberg has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Rydberg is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Rydberg is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Rydberg is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Rydberg is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.



STATE OF ILLINOIS)  
COUNTY OF COOK)

SS.

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS )  
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 vs )  
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 / )

Case No. \_\_\_\_\_

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Wayne Rydberg, Star #13986, has been charged in two Domestic Battery cases under Case Nos. 16 DV-07029 and 16 DV-71442. He has also been charged with Battery under Case No. 16-1194690. Case 16 DV-07029 is pending in Branch 64 at 555 West Harrison in Chicago and is next up on March 14, 2016 and case 16 DV-71442 is currently pending in Branch 62 at 555 West Harrison in Chicago and is next up on March 24, 2016. Case No.16-1194690 is pending in Branch 35 and is next up on March 25, 2016.
2. That Officer Rydberg will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Rydberg regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Rydberg regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

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Assistant State's Attorney

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Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Berwyn Police Officer Timothy Keske, Star# 200

Date: April 5, 2016

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Donald Pechous, Acting Chief, Civil Actions Bureau

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The Berwyn Police Department has provided notice to the office that on August 3, 2011 Berwyn Police Officer Timothy Keske was found in violation of Berwyn Police Department Rule 14 which prohibits making a false report.

As you are well aware, pursuant to Brady v. Maryland, 373 US 83 (1963), the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. Giglio v. United States, 405 U.S. 150, 154 (1972). The Berwyn Police Department's findings fall squarely under the type of disclosure required under Giglio.

If you or any of the assistants that you supervise have a case where Officer Keske is listed as a potential witness on our answer to discovery, the findings of the Berwyn Police Department must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Keske is a witness on any pending felony cases. Once I have the results of the search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Kekse is a witness on any pending felony cases.

If you or the assistants that you supervise have a case where any of the above officers is listed as a witness, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

Also please remind your ASAs that the mere fact that this Giglio material is discoverable and has been tendered to the defense does not in and of itself mean that the defense can introduce the evidence at trial or cross-examine any of the officers on the material. The ASAs should, in the appropriate cases, file all necessary motions to preclude the use of the Giglio material at trial.

The case law in this area is, of course, set out in United States v. Brady, 373 U.S. 83 (1963) and Giglio v. United States, 405 U.S. 150 (1972). The timing of disclosure is governed by Weatherford v. Bursey, 429 U.S. 545 (1977). What needs to be disclosed is discussed in United States v. Agurs, 427 U.S. 97 (1976); United States v. Diaz, 922 F.2d (2<sup>nd</sup> Cir. 1990); United States v. Veras, 51 F.3d 1365 (7<sup>th</sup> Cir. 1995) and United States v. Kiszewski, 877 F.2d 210 (2<sup>nd</sup> Cir. 1989). Limiting the use of this type of information is discussed in People v. Driskell, 213 Ill.App.3d 196 (4<sup>th</sup> Dist. 1991) and People v. Fonza, 217 Ill.App.3d 883, 892 (1st Dist. 1991).

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

SS.

COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS )

VS

Case No. \_\_\_\_\_

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**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That on August 3, 2011 the Berwyn Police Department found Berwyn Police Officer Timothy Keske, Star #200, in violation of Berwyn Police Department Rule 14, Making a false report.
2. That Officer Keske is listed as a witness for the prosecution in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Blue Island Police Sergeant Ismael Haro, Star# 215

Date: April 5, 2016

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Donald Pechous, Acting Chief, Civil Actions Bureau

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The City of Blue Island has provided notice to the office that on or about October 7, 2014 Blue Island Police Department Sergeant Ismael Haro was found in violation of Blue Island Police Department Rule 27.1.1.A.1 which prohibits the making false official reports or knowingly or willingly entering or causing to be entered into any department books, reports or records any inaccurate, false or improper police information or material matter.

As you are well aware, pursuant to Brady v. Maryland, 373 US 83 (1963), the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. Giglio v. United States, 405 U.S. 150, 154 (1972). The Blue Island Police Department's findings fall squarely

STATE OF ILLINOIS)

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COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS )

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**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That on or about October 7, 2014 Blue Island Police Department Sergeant Ismael Haro was found in violation of Blue Island Police Department Rule 27.1.1.A.1 which prohibits the making false official reports or knowingly or willingly entering or causing to be entered into any department books, reports or records any inaccurate, false or improper police information or material matter.
2. That Sergeant Haro is listed as a witness for the prosecution in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Indian Head Park Police Sergeant James Clendening

Date: April 5, 2016

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Donald Pechous, Acting Chief, Civil Actions Bureau

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The Indian Head Park Police Department has provided notice to the office that in 1999 Indian Head Park Police Sergeant James Clendening was found in violation of the Indian Head Park Police Department rule against falsifying official reports and in 1990 he was also found in violation of the Indian Head Park Police rule against deliberately falsifying official documents.

As you are well aware, pursuant to Brady v. Maryland, 373 US 83 (1963), the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. Giglio v. United States, 405 U.S. 150, 154 (1972). The Indian Head Park Police Department's findings fall squarely under the type of disclosure required under Giglio.



If you or any of the assistants that you supervise have a case where Sergeant Clendening is listed as a potential witness on our answer to discovery, the findings of the Indian Head Park Police Department must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether the officer is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Sergeant Clendening is a witness on any pending cases.

If you or the assistants that you supervise have a case where any of the above officers is listed as a witness, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

Also please remind your ASAs that the mere fact that this Giglio material is discoverable and has been tendered to the defense does not in and of itself mean that the defense can introduce the evidence at trial or cross-examine any of the officers on the material. The ASAs should, in the appropriate cases, file all necessary motions to preclude the use of the Giglio material at trial.

The case law in this area is, of course, set out in United States v. Brady, 373 U.S. 83 (1963) and Giglio v. United States, 405 U.S. 150 (1972). The timing of disclosure is governed by Weatherford v. Bursey, 429 U.S. 545 (1997). What needs to be disclosed is discussed in United States v. Agurs, 427 U.S. 97 (1976); United States v. Diaz, 922 F.2d (2<sup>nd</sup> Cir. 1990); United States v. Veras, 51 F.3d 1365 (7<sup>th</sup> Cir. 1995) and United States v. Kiszewski, 877 F.2d 210 (2<sup>nd</sup> Cir. 1989). Limiting the use of this type of information is discussed in People v. Driskell, 213 Ill.App.3d 196 (4<sup>th</sup> Dist. 1991) and People v. Fonza, 217 Ill.App.3d 883, 892 (1st Dist. 1991).

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

)

COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY

PEOPLE OF THE STATE OF ILLINOIS )

VS

Case No. \_\_\_\_\_

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**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That in 1990 the Indian Head Park police Department found Sergeant James Clendening, in violation of its rule against falsifying official reports.
2. That in 1999 the Indian Head Park police Department found Sergeant James Clendening, in violation of its rule against deliberately falsifying official documents.
3. That Sergeant James Clendening is listed as a witness for the prosecution in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Officer Vincent Escamilla, Star# 16095, 19<sup>th</sup> District

Date: April 18, 2016

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Don Pechous, Acting Chief, Civil Actions Bureau

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This is an update the December 14, 2015 memo regarding Chicago Police Officer Vincent Escamilla, Star# 16095, 19<sup>th</sup> District. Officer Escamilla was found guilty of Leaving the Scene of a Property Damage Accident under Case No. YB580455 and was placed on four months court supervision. The fact that Officer Escamilla is currently on court supervision should be disclosed to the defense prior to trial as that fact would be relevant to any motive, interest or bias he may have in testifying as a witness for the State.

If you or the assistants that you supervise have a case where Officer Escamilla is a witness and you determine that he is a necessary witness who needs to be called in the case, and, at the time of his testimony Officer Escamilla is still on court supervision, please file and tender to the defense the

attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

SS.

COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS )

VS

Case No. \_\_\_\_\_

1

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That on April 18, 2016, Chicago Police Officer Vincent Escamilla, Star #16095, was found guilty of Leaving the Scene of a Property Damage Accident and was placed on four months court supervision.
2. That Officer Escamilla will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Escamilla regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Escamilla regarding his court supervision in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

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Assistant State's Attorney

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**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Robbins Police Officer Cheron Gee

Date: April 21, 2016

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Donald Pechous, Acting Chief, Civil Actions Bureau

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Robbins Police Officer Cheron Gee, has been charged with the felony offenses of Loan Fraud and Forgery under Case No. 16MC5-002186. Our office is the prosecuting authority in Officer Gee's case. The case is currently pending in Room 103 in Bridgeview and is next up on May 19, 2016. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Gee as a witness, the fact that Officer Gee has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Gee is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you.

Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Gee is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Gee is a witness and you determine that she is a necessary witness and needs to be called in the case, and, at the time that Officer Gee is testifying her case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.



STATE OF ILLINOIS)

SS.

COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY

PEOPLE OF THE STATE OF ILLINOIS )

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**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Robbins Police Officer Cheron Gee, has been charged with Loan Fraud and Forgery. Those cases are next up on May 19, 2016 in Room 103, in Bridgeview
2. That Officer Gee will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Gee regarding her pending case in return for her testimony in the above-captioned case.
4. That no threats have been made to Officer Gee regarding her pending case in return for her testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

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Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Sgt. Patrick Conway, Star# 1470, 19<sup>th</sup> District

Date: April 22, 2016

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Donald Pechous, Acting Chief, Civil Actions Bureau

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It has been brought to the office's attention that Chicago Police Sgt. Patrick Conway, Star# 1470, 19<sup>th</sup> District has been charged with DUI under Ticket No. TK023833. Our office is the prosecuting authority in Sgt. Conway's case. The case is currently pending in Room 408, Traffic Court in Chicago and is next up on April 29, 2016. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Sgt. Conway as a witness, the fact that Sgt. Conway has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Sgt. Conway is a witness on any pending felony cases. Once I have the results of that search, I will forward them to

each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Sgt. Conway is a witness on any pending cases.

If you or the assistants that you supervise have a case where Sgt. Conway is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Sgt. Conway is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

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COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY

PEOPLE OF THE STATE OF ILLINOIS )

VS

Case No. \_\_\_\_\_

/

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Sgt. Patrick Conway, Star #1470, has been charged with DUI. That case is next up on April 29, 2016 in Room 408, Traffic Court, Daley Center, Chicago, Illinois.
2. That Sgt. Conway will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Sgt. Conway regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Sgt. Conway regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

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Assistant State's Attorney



OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Officer Jorge Martinez, Star# 14377

Date: May 3, 2016

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Donald Pechous, Acting Chief, Civil Actions Bureau

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On November 10, 2015 in the case of The People of the State of Illinois v. Miguel Rodriguez and Antonio Garcia, Indictment Number 13CR-17027, Judge William H. Hooks found the testimony of Chicago Police Office Jorge Martinez, Star# 14377 to be false.

As you are well aware, pursuant to Brady v. Maryland, 373 US 83 (1963), the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. Giglio v. United States, 405 U.S. 150, 154 (1972). Judge Hooks' finding falls under the type of disclosure required under Giglio.

If you or any of the assistants that you supervise have a case where Officer Martinez is listed as a potential witness on our answer to discovery, Judge Hooks' finding must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Martinez is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Martinez is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Martinez is listed as a witness, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

Also please remind your ASAs that the mere fact that this Giglio material is discoverable and has been tendered to the defense does not in and of itself mean that the defense can introduce the evidence at trial or cross-examine the officer on the material. The ASAs should, in the appropriate cases, file all necessary motions to preclude the use of the Giglio material at trial.

The case law in this area is, of course, set out in United States v. Brady, 373 U.S. 83 (1963) and Giglio v. United States, 405 U.S. 150 (1972). The timing of disclosure is governed by Weatherford v. Bursey, 429 U.S. 545 (1997). What needs to be disclosed is discussed in United States v. Agurs, 427 U.S. 97 (1976); United States v. Diaz, 922 F.2d (2<sup>nd</sup> Cir. 1990); United States v. Veras, 51 F.3d 1365 (7<sup>th</sup> Cir. 1995) and United States v. Kiszewski, 877 F.2d 210 (2<sup>nd</sup> Cir. 1989). Limiting the use of this type of information is discussed in People v. Driskell, 213 Ill.App.3d 196 (4<sup>th</sup> Dist. 1991) and People v. Fonza, 217 Ill.App.3d 883, 892 (1st Dist. 1991).

If you or your ASAs have any questions, please call me. Thank you.



STATE OF ILLINOIS)

SS.

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

VS

/

## Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Illinois State Trooper Valentino Diaz, Star# 6393

Date: May 3, 2016

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Donald Pechous. Acting Chief, Civil Actions Bureau

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It has been brought to the office's attention that Illinois State Trooper Valentino Diaz has been charged with DUI under Case No. TK110482. Our office is the prosecuting authority in Trooper Diaz's case. The case is currently pending in Room 406 in Traffic Court and is next up on May 5, 2016. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Trooper Diaz as a witness, the fact that Trooper Diaz has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Trooper Diaz is a witness on any pending felony cases. Once I have the results of that search, I will forward them to

each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Trooper Diaz is a witness on any pending cases.

If you or the assistants that you supervise have a case where Trooper Diaz is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Trooper Diaz is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

SS.

COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS     )  
                                                      )  
                              vs                        )  
                                                      )  
                              /                        )

Case No. \_\_\_\_\_

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Illinois State Trooper Valentino Diaz, Star# 639, has been charged with DUI. That case is next up on May 5, 2016 in Room 406, Traffic Court, Daley Center, Chicago, Illinois.
2. That Trooper Diaz will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Trooper Diaz regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Trooper Diaz regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

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Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Giglio material regarding Chicago Police Officer James Lynch, Star#10183

Date: May 5, 2016

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrsoe, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous, Acting Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

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On January 25, 2016 The Honorable Judge Joseph Claps, in the case of The People of The State of Illinois v. Elliott Wills, 15CR-6034, made findings regarding the credibility of Chicago Police Officer James Lynch, Star# 10183, that may impact his credibility should he testify in court in the future. A copy of Judge Claps' findings is attached to this memo.

Pursuant to Brady v. Maryland, 373 US 83 (1963), the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. Giglio v. United States, 405 U.S. 150, 154 (1972). Judge Claps' findings regarding Officer Lynch's testimony could potentially be found to be the type of information required to be disclosed under Giglio.

Given this possibility, if you or any of the assistants that you supervise have a case where Officer Lynch is listed as a potential witness on our answer to discovery, Judge Claps' finding is to be disclosed to the defense prior to trial. The MIS Department is doing a computer search to determine whether Officer Lynch is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS and have another list run. In addition, MIS has been instructed to flag Officer Lynch's name in CRIMES to alert ASAs that a notice of disclosure is required in the case. Units that do not have a computer case management system will have to check their files to determine whether Officer Lynch is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Lynch is listed as a witness, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your knowledge. An electronic copy of the notice will be sent to you.

Also please remind your ASAs that the mere fact that this possible Giglio material is discoverable and has been tendered to the defense does not in and of itself mean that the defense can introduce the evidence at trial or cross-examine Officer Lynch regarding the material. The ASAs should, in the appropriate cases, file all necessary motions to seek a judicial determination as to whether this information is Giglio material and, if so, whether the material is relevant and admissible at any trial or hearing where Officer Lynch is going to be called as a witness.

In general, the case law in this area is, of course, set out in United States v. Brady, 373 U.S. 83 (1963) and Giglio v. United States, 405 U.S. 150 (1972). The timing of disclosure is governed by Weatherford v. Bursey, 429 U.S. 545 (1997). What needs to be disclosed is discussed in United States v. Agurs, 427 U.S. 97 (1976); United States v. Diaz, 922 F.2d (2<sup>nd</sup> Cir. 1990); United States v. Veras, 51 F.3d 1365 (7<sup>th</sup> Cir. 1995) and United States v. Kiszewski, 877 F.2d 210 (2<sup>nd</sup> Cir. 1989). Limiting the use of this type of information is discussed in People v. Driskell, 213 Ill.App.3d 196 (4<sup>th</sup> Dist. 1991) and People v. Fonza, 217 Ill.App.3d 883, 892 (1st Dist. 1991).

STATE OF ILLINOIS)

SS.

COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY

PEOPLE OF THE STATE OF ILLINOIS )

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**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. On January 25, 2016 The Honorable Judge Joseph Claps, in the case of The People of The State of Illinois v. Elliott Wills, 15CR-6034, made findings regarding the credibility of Chicago Police Officer James Lynch, Star# 10183, that may impact his credibility should he testify in court in the future. A copy of Judge Claps' findings is attached to this memo.
2. That Officer Lynch is listed as a witness for the prosecution in the above-captioned case.
3. A copy of Judge Claps' January 25, 2016 finding is attached to this Notice.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

Assistant State's Attorney





OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Giglio material regarding Chicago Police Officer Wahbe Askar, Star# 8156

Date: May 5, 2016

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrsoe, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous, Acting Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

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On August 5, 2015 The Honorable Judge Joseph Claps, in the case of The People of The State of Illinois v. Steven Brown, 14CR-17730, made findings regarding the credibility of Chicago Police Officer Wahbe Askar, Star# 8156 that may impact his credibility should he testify in court in the future. A copy of Judge Claps' findings is attached to this memo.

Pursuant to Brady v. Maryland, 373 US 83 (1963), the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. Giglio v. United States, 405 U.S. 150, 154 (1972). Judge Claps' findings regarding Officer Askar's testimony could potentially be found to be the type of information required to be disclosed under Giglio.

Given this possibility, if you or any of the assistants that you supervise have a case where Officer Askar is listed as a potential witness on our answer to discovery, Judge Claps' finding is to be disclosed to the defense prior to trial. The MIS Department is doing a computer search to determine whether Officer Askar is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS and have another list run. In addition, MIS has been instructed to flag Officer Askar's name in CRIMES to alert ASAs that a notice of disclosure is required in the case. Units that do not have a computer case management system will have to check their files to determine whether Officer Askar is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Askar is listed as a witness, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your knowledge. An electronic copy of the notice will be sent to you.

Also please remind your ASAs that the mere fact that this possible Giglio material is discoverable and has been tendered to the defense does not in and of itself mean that the defense can introduce the evidence at trial or cross-examine Officer Askar regarding the material. The ASAs should, in the appropriate cases, file all necessary motions to seek a judicial determination as to whether this information is Giglio material and, if so, whether the material is relevant and admissible at any trial or hearing where Officer Askar is going to be called as a witness.

In general, the case law in this area is, of course, set out in United States v. Brady, 373 U.S. 83 (1963) and Giglio v. United States, 405 U.S. 150 (1972). The timing of disclosure is governed by Weatherford v. Bursey, 429 U.S. 545 (1997). What needs to be disclosed is discussed in United States v. Agurs, 427 U.S. 97 (1976); United States v. Diaz, 922 F.2d (2<sup>nd</sup> Cir. 1990); United States v. Veras, 51 F.3d 1365 (7<sup>th</sup> Cir. 1995) and United States v. Kiszewski, 877 F.2d 210 (2<sup>nd</sup> Cir. 1989). Limiting the use of this type of information is discussed in People v. Driskell, 213 Ill.App.3d 196 (4<sup>th</sup> Dist. 1991) and People v. Fonza, 217 Ill.App.3d 883, 892 (1st Dist. 1991).

STATE OF ILLINOIS)  
                                )     SS.  
COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS       )  
                                                                )  
vs                                                              ) Case No. \_\_\_\_\_  
                                                                )  
/                                                             )

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That on August 5, 2015 the Honorable Judge Joseph Claps, in the case of The People of the State of Illinois v. Steven Brown, 14CR-17730, made findings regarding the testimony of Chicago Police Officer Wahbe Askar, Star# 8156, that may impact his credibility should he testify in court in the future.
2. That Officer Askar is listed as a witness for the prosecution in the above-captioned case.
3. A copy of Judge Claps' August 5, 2016 finding is attached to this Notice.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

Assistant State's Attorney



OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Potential Giglio material regarding Chicago Police Officer John Dolan, Star# 7722

Date: May 13, 2016

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrsoe, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous, Acting Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

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On October 1, 2014 The Honorable Judge Thomas Hennelly, in the case of The People of The State of Illinois v. Alexander Villa, 12CR-20098, made findings regarding the credibility of Chicago Police Officer John Dolan, Star# 7722 that may impact his credibility should he testify in court in the future. A copy of Judge Hennelly's findings is attached to this memo.

Pursuant to Brady v. Maryland, 373 US 83 (1963), the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. Giglio v. United States, 405 U.S. 150, 154 (1972). Judge Hennelly's findings regarding Officer Dolan's testimony could potentially be found to be the type of information required to be disclosed under Giglio.

Given this possibility, if you or any of the assistants that you supervise have a case where Officer Dolan is listed as a potential witness on our answer to discovery, Judge Hennelly's finding is to be disclosed to the defense prior to trial. The MIS Department is doing a computer search to determine whether Officer Dolan is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS and have another list run. In addition, MIS has been instructed to flag Officer Dolan's name in CRIMES to alert ASAs that a notice of disclosure is required in the case. Units that do not have a computer case management system will have to check their files to determine whether Officer Dolan is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Dolan is listed as a witness, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your knowledge. An electronic copy of the notice will be sent to you.

Also please remind your ASAs that the mere fact that this possible Giglio material is discoverable and has been tendered to the defense does not in and of itself mean that the defense can introduce the evidence at trial or cross-examine Officer Dolan regarding the material. The ASAs should, in the appropriate cases, file all necessary motions to seek a judicial determination as to whether this information is Giglio material and, if so, whether the material is relevant and admissible at any trial or hearing where Officer Dolan is going to be called as a witness.

In general, the case law in this area is, of course, set out in United States v. Brady, 373 U.S. 83 (1963) and Giglio v. United States, 405 U.S. 150 (1972). The timing of disclosure is governed by Weatherford v. Bursey, 429 U.S. 545 (1997). What needs to be disclosed is discussed in United States v. Agurs, 427 U.S. 97 (1976); United States v. Diaz, 922 F.2d (2<sup>nd</sup> Cir. 1990); United States v. Veras, 51 F.3d 1365 (7<sup>th</sup> Cir. 1995) and United States v. Kiszewski, 877 F.2d 210 (2<sup>nd</sup> Cir. 1989). Limiting the use of this type of information is discussed in People v. Driskell, 213 Ill.App.3d 196 (4<sup>th</sup> Dist. 1991) and People v. Fonza, 217 Ill.App.3d 883, 892 (1st Dist. 1991).

STATE OF ILLINOIS)

SS.

COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY

PEOPLE OF THE STATE OF ILLINOIS )

Case No. \_\_\_\_\_

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## NOTICE OF DISCLOSURE TO THE DEFENDANT

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That on October 1, 2014 the Honorable Judge Thomas Hennelly, in the case of The People of the State of Illinois v. Alexander Villa, 12CR-20098, made findings regarding the testimony of Chicago Police Officer John Dolan, Star# 7722, that may impact his credibility should he testify in court in the future.
2. That Officer Dolan is listed as a witness for the prosecution in the above-captioned case.
3. A copy of Judge Hennelly's October 1, 2014 finding is attached to this Notice.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Potential Giglio material regarding Chicago Police Officer Matthew Lopez,  
Star#14763

Date: May 16, 2016

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrsoe, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous, Acting Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

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On November 5, 2015 The Honorable Judge William Hooks, in the case of The People of The State of Illinois v. Jeremiah Buford, 14CR-19352, made findings regarding the credibility of Chicago Police Officer Matthew Lopez, Star# 14763 in that he found that Officer Lopez had a reckless disregard for the truth, that he had zero credibility with the court and referred to him as an absolute liar. Those findings may impact his credibility should he testify in court in the future and a copy of Judge Hooks' findings is attached to this memo.

Pursuant to Brady v. Maryland, 373 US 83 (1963), the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes

evidence that may impeach the credibility of a prosecution witness. Giglio v. United States, 405 U.S. 150, 154 (1972). Judge Hooks' findings regarding Officer Lopez's testimony could potentially be found to be the type of information required to be disclosed under Giglio.

Given this possibility, if you or any of the assistants that you supervise have a case where Officer Lopez is listed as a potential witness on our answer to discovery, Judge Hooks' finding is to be disclosed to the defense prior to trial. The MIS Department is doing a computer search to determine whether Officer Lopez is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS and have another list run. In addition, MIS has been instructed to flag Officer Lopez's name in CRIMES to alert ASAs that a notice of disclosure is required in the case. Units that do not have a computer case management system will have to check their files to determine whether Officer Lopez is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Lopez is listed as a witness, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your knowledge. An electronic copy of the notice will be sent to you.

Also please remind your ASAs that the mere fact that this possible Giglio material is discoverable and has been tendered to the defense does not in and of itself mean that the defense can introduce the evidence at trial or cross-examine Officer Lopez regarding the material. The ASAs should, in the appropriate cases, file all necessary motions to seek a judicial determination as to whether this information is Giglio material and, if so, whether the material is relevant and admissible at any trial or hearing where Officer Lopez is going to be called as a witness.

In general, the case law in this area is, of course, set out in United States v. Brady, 373 U.S. 83 (1963) and Giglio v. United States, 405 U.S. 150 (1972). The timing of disclosure is governed by Weatherford v. Bursey, 429 U.S. 545 (1977). What needs to be disclosed is discussed in United States v. Agurs, 427 U.S. 97 (1976); United States v. Diaz, 922 F.2d (2<sup>nd</sup> Cir. 1990); United States v. Veras, 51 F.3d 1365 (7<sup>th</sup> Cir. 1995) and United States v. Kiszewski, 877 F.2d 210 (2<sup>nd</sup> Cir. 1989). Limiting the use of this type of information is discussed in People v. Driskell, 213 Ill.App.3d 196 (4<sup>th</sup> Dist. 1991) and People v. Fonza, 217 Ill.App.3d 883, 892 (1st Dist. 1991).



STATE OF ILLINOIS)

SS.

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

VS

/

## Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Potential Giglio material regarding Chicago Police Officer Ricky Page, Star# 11349

Date: May 18, 2016

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrsoe, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous, Acting Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

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On May 2, 2016 The Honorable Judge William Hooks, in the case of The People of The State of Illinois v. Kadaivion Jones, 16CR-216, made findings regarding the credibility of Chicago Police Officer Ricky Page, Star# 11349 that may impact his credibility should he testify in court in the future. A copy of Judge Hooks' findings is attached to this memo.

Pursuant to Brady v. Maryland, 373 US 83 (1963), the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. Giglio v. United States, 405 U.S. 150, 154 (1972). Judge Hooks' findings regarding Officer Page's testimony could potentially be found to be the type of information required to be disclosed under Giglio.

Given this possibility, if you or any of the assistants that you supervise have a case where Officer Page is listed as a potential witness on our answer to discovery, Judge Hooks' finding is to be disclosed to the defense prior to trial. The MIS Department is doing a computer search to determine whether Officer Page is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS and have another list run. In addition, MIS has been instructed to flag Officer Page's name in CRIMES to alert ASAs that a notice of disclosure is required in the case. Units that do not have a computer case management system will have to check their files to determine whether Officer Page is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Page is listed as a witness, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your knowledge. An electronic copy of the notice will be sent to you.

Also please remind your ASAs that the mere fact that this possible Giglio material is discoverable and has been tendered to the defense does not in and of itself mean that the defense can introduce the evidence at trial or cross-examine Officer Page regarding the material. The ASAs should, in the appropriate cases, file all necessary motions to seek a judicial determination as to whether this information is Giglio material and, if so, whether the material is relevant and admissible at any trial or hearing where Officer Page is going to be called as a witness.

In general, the case law in this area is, of course, set out in United States v. Brady, 373 U.S. 83 (1963) and Giglio v. United States, 405 U.S. 150 (1972). The timing of disclosure is governed by Weatherford v. Bursey, 429 U.S. 545 (1997). What needs to be disclosed is discussed in United States v. Agurs, 427 U.S. 97 (1976); United States v. Diaz, 922 F.2d (2<sup>nd</sup> Cir. 1990); United States v. Veras, 51 F.3d 1365 (7<sup>th</sup> Cir. 1995) and United States v. Kiszewski, 877 F.2d 210 (2<sup>nd</sup> Cir. 1989). Limiting the use of this type of information is discussed in People v. Driskell, 213 Ill.App.3d 196 (4<sup>th</sup> Dist. 1991) and People v. Fonza, 217 Ill.App.3d 883, 892 (1st Dist. 1991).

COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

/

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. On May 2, 2016 The Honorable Judge William Hooks, in the case of The People of The State of Illinois v. Kadaivion Jones, 16CR-216, made findings regarding the credibility of Chicago Police Officer Ricky Page, Star# 11349 that may impact his credibility should he testify in court in the future.
2. That Officer Page is listed as a witness for the prosecution in the above-captioned case.
3. A copy of Judge Hooks' May 2, 2016 finding is attached to this Notice.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Potential Giglio material regarding Chicago Police Officer Arturo Fonseca, Star# 10739

Date: June 22, 2016

Cc: Dan Kirk, First Assistant  
Walt Hehner, Chief Deputy  
Garvin Ambrsoe, Chief of Staff  
Fabio Valentini, Chief, Criminal Prosecutions Bureau  
Mike Golden, Chief, Special Prosecutions Bureau  
Tisa Morris, Chief, Juvenile Justice Bureau  
Donald Pechous, Acting Chief, Civil Actions Bureau  
Brian Sexton, Chief, Narcotics Prosecutions Bureau

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On May 16, 2016 The Honorable Judge Cynthia Ramirez, in the case of In re P.C., 16 JD 895, made an adverse credibility finding regarding the testimony of Chicago Police Officer Arturo Fonseca, Star# 10739. A copy of Judge Ramirez's findings is attached to this memo.

Pursuant to Brady v. Maryland, 373 US 83 (1963), the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. Giglio v. United States, 405 U.S. 150, 154 (1972). Judge Ramirez's finding regarding Officer Fonseca's testimony could potentially be found to be the type of information required to be disclosed under Giglio.

Given this possibility, if you or any of the assistants that you supervise have a case where Officer Fonseca is listed as a potential witness on our answer to discovery, Judge Ramirez's finding is to be disclosed to the defense prior to trial. The MIS Department is doing a computer search to determine whether Officer Fonseca is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS and have another list run. In addition, MIS has been instructed to flag Officer Fonseca's name in CRIMES in order to alert ASAs that a notice of disclosure is required in the case. Units that do not have a computer case management system will have to check their files to determine whether Officer Fonseca is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Fonseca is listed as a witness, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your knowledge. An electronic copy of the notice will be sent to you.

Also please remind your ASAs that the mere fact that this possible Giglio material is discoverable and has been tendered to the defense does not in and of itself mean that the defense can introduce the evidence at trial or cross-examine Officer Fonseca regarding the material. The ASAs should, in the appropriate cases, file all necessary motions to seek a judicial determination as to whether this information is Giglio material and, if so, whether the material is relevant and admissible at any trial or hearing where Officer Fonseca is going to be called as a witness.

In general, the case law in this area is, of course, set out in United States v. Brady, 373 U.S. 83 (1963) and Giglio v. United States, 405 U.S. 150 (1972). The timing of disclosure is governed by Weatherford v. Bursey, 429 U.S. 545 (1997). What needs to be disclosed is discussed in United States v. Agurs, 427 U.S. 97 (1976); United States v. Diaz, 922 F.2d (2<sup>nd</sup> Cir. 1990); United States v. Veras, 51 F.3d 1365 (7<sup>th</sup> Cir. 1995) and United States v. Kiszewski, 877 F.2d 210 (2<sup>nd</sup> Cir. 1989). Limiting the use of this type of information is discussed in People v. Driskell, 213 Ill.App.3d 196 (4<sup>th</sup> Dist. 1991) and People v. Fonza, 217 Ill.App.3d 883, 892 (1st Dist. 1991).

STATE OF ILLINOIS)

SS.

COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY

PEOPLE OF THE STATE OF ILLINOIS )

VS

Case No.

/

## NOTICE OF DISCLOSURE TO THE DEFENDANT

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. On May 16, 2016 The Honorable Judge Cynthia Ramirez, in the case of In re P.C., 16 JD 895, made an adverse credibility finding regarding the testimony of Chicago Police Officer Arturo Fonseca, Star# 10739.
2. That Officer Fonseca is listed as a witness for the prosecution in the above-captioned case.
3. A copy of Judge Ramirez's May 16, 2016 finding is attached to this Notice.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Calumet City Police Officer Robert Zieminski

Date: June 27, 2016

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Donald Pechous, Acting Chief, Civil Actions Bureau

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It has been brought to the office's attention that Calumet City Police Officer Mark Zieminski, has been charged with Domestic Battery under Case No. 16DV-61193. Our office is the prosecuting authority in Officer Zieminski's case. The case is currently pending in Room 104 in Markham and is next up on July 18, 2016. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Zieminski as a witness, the fact that Officer Zieminski has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Zieminski is a witness on any pending felony cases. Once I have the results of that search, I will



forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Zieminski is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Zieminski is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Zieminski is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

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SS.

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

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## Assistant State's Attorney

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Assistant State's Attorney



OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Potential Giglio material regarding Chicago Police Officer Roberto Ramirez, Star# 12661

Date: June 30, 2016

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrsoe, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous, Acting Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

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On March 17, 2016 The Honorable Judge Joseph Claps, in the case of The People of the State of Illinois v. Miguel Torres, 14CR-21190, made an adverse credibility finding regarding the testimony of Chicago Police Officer Roberto Ramirez, Star# 12661. A copy of Judge Claps' findings is attached to this memo.

Pursuant to Brady v. Maryland, 373 US 83 (1963), the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. Giglio v. United States, 405 U.S. 150, 154 (1972). Judge Claps' finding regarding Officer Ramirez's testimony could potentially be

found to be the type of information required to be disclosed under Giglio.

Given this possibility, if you or any of the assistants that you supervise have a case where Officer Ramirez is listed as a potential witness on our answer to discovery, Judge Claps' finding is to be disclosed to the defense prior to trial. The MIS Department is doing a computer search to determine whether Officer Ramirez is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS and have another list run. In addition, MIS has been instructed to flag Officer Ramirez's name in CRIMES in order to alert ASAs that a notice of disclosure is required in the case. Units that do not have a computer case management system will have to check their files to determine whether Officer Ramirez is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Ramirez is listed as a witness and they are intending to call him as a witness at trial, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your knowledge. An electronic copy of the notice will be sent to you.

Also please remind your ASAs that the mere fact that this possible Giglio material is discoverable and has been tendered to the defense does not in and of itself mean that the defense can introduce the evidence at trial or cross-examine Officer Ramirez regarding the material. The ASAs should, in the appropriate cases, file all necessary motions to seek a judicial determination as to whether this information is Giglio material and, if so, whether the material is relevant and admissible at any trial or hearing where Officer Ramirez is going to be called as a witness.

In general, the case law in this area is, of course, set out in United States v. Brady, 373 U.S. 83 (1963) and Giglio v. United States, 405 U.S. 150 (1972). The timing of disclosure is governed by Weatherford v. Bursey, 429 U.S. 545 (1997). What needs to be disclosed is discussed in United States v. Agurs, 427 U.S. 97 (1976); United States v. Diaz, 922 F.2d (2<sup>nd</sup> Cir. 1990); United States v. Veras, 51 F.3d 1365 (7<sup>th</sup> Cir. 1995) and United States v. Kiszewski, 877 F.2d 210 (2<sup>nd</sup> Cir. 1989). Limiting the use of this type of information is discussed in People v. Driskell, 213 Ill.App.3d 196 (4<sup>th</sup> Dist. 1991) and People v. Fonza, 217 Ill.App.3d 883, 892 (1st Dist. 1991).

STATE OF ILLINOIS)

SS.

)

IN THE CIRCUIT COURT OF COOK COUNTY

PEOPLE OF THE STATE OF ILLINOIS )

VS

Case No.

/

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. On March 17, 2016 The Honorable Judge Joseph Claps, in the case of The People of the State of Illinois v. Miguel Torres, 14CR-21190, made an adverse credibility finding regarding the testimony of Chicago Police Officer Roberto Ramirez, Star# 12661.
2. That Officer Ramirez is listed as a witness for the prosecution in the above-captioned case.
3. A copy of Judge Claps' March 17, 2016 finding is attached to this Notice.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Officer Dominique Allen, Star# 13602,

Date: July 15, 2016

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous, Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Officer Dominique Allen, Star# 13602, Unit 311 has been charged with DUI under Case No. 39192918. Our office is the prosecuting authority in Officer Allen's case. The case is currently pending in Traffic Court and is next up on August 8, 2016. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Allen as a witness, the fact that Officer Allen has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Allen is a

witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Allen is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Allen is a witness and you determine that she is a necessary witness and needs to be called in the case, and, at the time that Officer Allen is testifying her case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.



STATE OF ILLINOIS)

SS.

COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY

PEOPLE OF THE STATE OF ILLINOIS )

VS

Case No. \_\_\_\_\_

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**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Dominique Allen, Star #13602, has been charged with DUI. That case is next up on August 8, 2016 at Traffic Court, Daley Center, Chicago, Illinois.
2. That Officer Allen will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Allen regarding her pending case in return for her testimony in the above-captioned case.
4. That no threats have been made to Officer Allen regarding her pending case in return for her testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

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Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Cook County Forest Preserve Police Officer Joe Gotch

Date: July 21, 2015

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrsoe, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Daniel Gallagher, Chief, Civil Actions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

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Cook County Forest Preserve Police Officer Joe Gotch has been charged with felony Criminal Damage to Property under indictment number 15CR-10152. MIS is conducting a search of CRIMES to determine whether Officer Gotch is a witness on any pending felony cases. Once I have the results of that search, I will forward the results to you. If your unit does not have a computer case management system, please have your ASAs check their files and see whether they have any cases on their call where Officer Gotch is a witness on a pending case. If he is a witness on the case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Gotch's testimony you should proceed on the case.

If you have a case where we cannot proceed without Gotch's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Gotch's cases they have and how many of those cases were dismissed.

If you or your ASAs have any questions, please call me. Thank you.



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Oak Forest Police Officer, Arthur Roman, #184

Date: March 2, 2016

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Donald Pechous. Acting Chief, Civil Actions Bureau

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It has been brought to the office's attention that Oak Forest Police Officer Arthur Roman, Star# 184, has been charged with Assault with a Deadly Weapon in Huntington Beach, California. The case is next up there on April 27, 2016. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Roman as a witness, the fact that Officer Roman has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Roman is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case

management system will have to check their files to determine whether Officer Roman is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Roman is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Roman is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)  
COUNTY OF COOK)

SS.

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS )  
 )  
 vs )  
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 / )

Case No. \_\_\_\_\_

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Oak Forest Police Officer Arthur Roman, #184, has been charged with Assault with a Deadly Weapon in Huntington Beach, California. That case is next up on April 27, 2016.
2. That Officer Roman will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Roman regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Roman regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

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Assistant State's Attorney





**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Officer Steve Jedd, Star# 14361, 15<sup>th</sup> District

Date: March 14, 2016

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Donald Pechous. Acting Chief, Civil Actions Bureau

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It has been brought to the office's attention that Chicago Police Officer Steve Jedd, Star# 14361, 15<sup>th</sup> District has been charged with Domestic Battery under Case No. 16 DV-72577. Our office is the prosecuting authority in Officer Jedd's case. The case is currently pending in Branch 61 at 555 West Harrison in Chicago and is next up on March 29, 2016. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Jedd as a witness, the fact that Officer Jedd has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Jedd is a witness on

any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Jedd is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Jedd is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Jedd is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

SS.

COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY

PEOPLE OF THE STATE OF ILLINOIS )

VS

Case No.

/

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Steve Jedd, Star #14361, has been charged with Domestic Battery. That case is next up on March 29, 2016 in Branch 61, 555 West Harrison, Chicago, Illinois.
2. That Officer Jedd will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Jedd regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Jedd regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

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Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Potential Giglio material regarding Chicago Police Officers Gildardo Sierra, Star# 3656 and Steven Carroll, Star# 12236

Date: May 17, 2016

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrsoe, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous, Acting Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

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On March 22, 2011 The Honorable Judge William Hooks, in the case of The People of The State of Illinois v. George Davis, 09CR-6823, made findings regarding the credibility of Chicago Police Officers Gildardo Sierra, Star# 3656 and Steven Carroll, Star# 12236 that may impact their credibility should they testify in court in the future. A copy of Judge Hooks' findings is attached to this memo.

Pursuant to Brady v. Maryland, 373 US 83 (1963), the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. Giglio v. United States, 405 U.S.

150, 154 (1972). Judge Hooks' findings regarding Officers Sierra's and Carroll's testimony could potentially be found to be the type of information required to be disclosed under Giglio.

Given this possibility, if you or any of the assistants that you supervise have a case where either Officer Sierra or Officer Carroll is listed as a potential witness on our answer to discovery, Judge Hooks' finding is to be disclosed to the defense prior to trial. The MIS Department is doing a computer search to determine whether Officer Sierra or Officer Dolan is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS and have another list run. In addition, MIS has been instructed to flag Officer Sierra's and Officer Carroll's names in CRIMES to alert ASAs that a notice of disclosure is required in the case. Units that do not have a computer case management system will have to check their files to determine whether Officer Sierra or Officer Carroll is a witness on any pending cases.

If you or the assistants that you supervise have a case where either Officer Sierra or Officer Carroll is listed as a witness, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your knowledge. An electronic copy of the notice will be sent to you.

Also please remind your ASAs that the mere fact that this possible Giglio material is discoverable and has been tendered to the defense does not in and of itself mean that the defense can introduce the evidence at trial or cross-examine Officer Dolan regarding the material. The ASAs should, in the appropriate cases, file all necessary motions to seek a judicial determination as to whether this information is Giglio material and, if so, whether the material is relevant and admissible at any trial or hearing where Officer Sierra or Officer Carroll is going to be called as a witness.

In general, the case law in this area is, of course, set out in United States v. Brady, 373 U.S. 83 (1963) and Giglio v. United States, 405 U.S. 150 (1972). The timing of disclosure is governed by Weatherford v. Bursey, 429 U.S. 545 (1997). What needs to be disclosed is discussed in United States v. Agurs, 427 U.S. 97 (1976); United States v. Diaz, 922 F.2d (2<sup>nd</sup> Cir. 1990); United States v. Veras, 51 F.3d 1365 (7<sup>th</sup> Cir. 1995) and United States v. Kiszewski, 877 F.2d 210 (2<sup>nd</sup> Cir. 1989). Limiting the use of this type of information is discussed in People v. Driskell, 213 Ill.App.3d 196 (4<sup>th</sup> Dist. 1991) and People v. Fonza, 217 Ill.App.3d 883, 892 (1st Dist. 1991).

STATE OF ILLINOIS)

SS.

COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY

PEOPLE OF THE STATE OF ILLINOIS )

VS

Case No. \_\_\_\_\_

/

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That on March 22, 2011 the Honorable Judge William Hooks, in the case of The People of the State of Illinois v. George Davis, 09CR-6823, made findings regarding the testimony of Chicago Police Officer Gildardo Sierra, Star# 3656/Steven Carroll, Star #12236 that may impact his credibility should he testify in court in the future.
2. That Officer Sierra/Carroll is listed as a witness for the prosecution in the above-captioned case.
3. A copy of Judge Hooks' March 22, 2011 finding is attached to this Notice.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Potential Giglio material regarding Chicago Police Officer Benny Williams, Star# 12544

Date: May 19, 2016

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrsoe, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous, Acting Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

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On April 1, 2016 The Honorable Judge William Hooks, in the case of The People of The State of Illinois v. Christopher Haynes a.k.a. Joshua Davis, 14CR-19746, made findings regarding the credibility of Chicago Police Officer Benny Williams, Star# 12544 that may impact his credibility should he testify in court in the future. A copy of Judge Hooks' findings is attached to this memo.

Pursuant to Brady v. Maryland, 373 US 83 (1963), the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. Giglio v. United States, 405 U.S. 150, 154 (1972). Judge Hooks' findings regarding Officer Williams' testimony could potentially be



found to be the type of information required to be disclosed under Giglio.

Given this possibility, if you or any of the assistants that you supervise have a case where Officer Williams is listed as a potential witness on our answer to discovery, Judge Hooks' finding is to be disclosed to the defense prior to trial. The MIS Department is doing a computer search to determine whether Officer Williams is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS and have another list run. In addition, MIS has been instructed to flag Officer Williams' name in CRIMES to alert ASAs that a notice of disclosure is required in the case. Units that do not have a computer case management system will have to check their files to determine whether Officer Williams is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Williams is listed as a witness, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your knowledge. An electronic copy of the notice will be sent to you.

Also please remind your ASAs that the mere fact that this possible Giglio material is discoverable and has been tendered to the defense does not in and of itself mean that the defense can introduce the evidence at trial or cross-examine Officer Williams regarding the material. The ASAs should, in the appropriate cases, file all necessary motions to seek a judicial determination as to whether this information is Giglio material and, if so, whether the material is relevant and admissible at any trial or hearing where Officer Williams is going to be called as a witness.

In general, the case law in this area is, of course, set out in United States v. Brady, 373 U.S. 83 (1963) and Giglio v. United States, 405 U.S. 150 (1972). The timing of disclosure is governed by Weatherford v. Bursey, 429 U.S. 545 (1997). What needs to be disclosed is discussed in United States v. Agurs, 427 U.S. 97 (1976); United States v. Diaz, 922 F.2d (2<sup>nd</sup> Cir. 1990); United States v. Veras, 51 F.3d 1365 (7<sup>th</sup> Cir. 1995) and United States v. Kiszewski, 877 F.2d 210 (2<sup>nd</sup> Cir. 1989). Limiting the use of this type of information is discussed in People v. Driskell, 213 Ill.App.3d 196 (4<sup>th</sup> Dist. 1991) and People v. Fonza, 217 Ill.App.3d 883, 892 (1st Dist. 1991).

STATE OF ILLINOIS)

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COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY

PEOPLE OF THE STATE OF ILLINOIS )

VS

Case No. \_\_\_\_\_

/

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That on April 1, 2016 The Honorable Judge William Hooks, in the case of The People of The State of Illinois v. Christopher Haynes a.k.a. Joshua Davis, 14CR-19746, made findings regarding the credibility of Chicago Police Officer Benny Williams, Star# 12544 that may impact his credibility should he testify in court in the future.
2. That Officer Williams is listed as a witness for the prosecution in the above-captioned case.
3. A copy of Judge Hooks' April 1, 2016 finding is attached to this Notice.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Potential Giglio material regarding Chicago Police Sgt. Corey Petracco, Star# 2545,  
11<sup>th</sup> District

Date: September 6, 2016

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrsoe, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous, Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

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On March 23, 2016 The Honorable Judge Thaddeus Wilson, in the case of The People of the State of Illinois v. Joshua Perez, 14CR-12117, made an adverse credibility finding regarding the testimony of Chicago Police Sgt. Corey Petracco, Star# 2545. At the time of the finding, Officer Petracco's Star# was 18314. A copy of Judge Wilson's findings is attached to this memo.

Pursuant to Brady v. Maryland, 373 US 83 (1963), the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. Giglio v. United States, 405 U.S. 150, 154 (1972). Judge Wilson's finding regarding Officer Petracco's testimony could potentially be

found to be the type of information required to be disclosed under Giglio.

Given this possibility, if you or any of the assistants that you supervise have a case where Officer Petracco is listed as a potential witness on our answer to discovery, Judge Wilson's finding is to be disclosed to the defense prior to trial. The MIS Department is doing a computer search to determine whether Officer Petracco is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS and have another list run. In addition, MIS has been instructed to flag Officer Petracco's name in CRIMES in order to alert ASAs that a notice of disclosure is required in the case. Units that do not have a computer case management system will have to check their files to determine whether Officer Petracco is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Petracco is listed as a witness and it is intended to call him as a witness at trial, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your knowledge. An electronic copy of the notice will be sent to you.

Also please remind your ASAs that the mere fact that this possible Giglio material is discoverable and has been tendered to the defense does not in and of itself mean that the defense can introduce the evidence at trial or cross-examine Officer Petracco regarding the material. The ASAs should, in the appropriate cases, file all necessary motions to seek a judicial determination as to whether this information is Giglio material and, if so, whether the material is relevant and admissible at any trial or hearing where Officer Petracco is going to be called as a witness.

In general, the case law in this area is, of course, set out in United States v. Brady, 373 U.S. 83 (1963) and Giglio v. United States, 405 U.S. 150 (1972). The timing of disclosure is governed by Weatherford v. Bursey, 429 U.S. 545 (1997). What needs to be disclosed is discussed in United States v. Agurs, 427 U.S. 97 (1976); United States v. Diaz, 922 F.2d (2<sup>nd</sup> Cir. 1990); United States v. Veras, 51 F.3d 1365 (7<sup>th</sup> Cir. 1995) and United States v. Kiszewski, 877 F.2d 210 (2<sup>nd</sup> Cir. 1989). Limiting the use of this type of information is discussed in Illinois Rule of Evidence 608 as well as in People v. Driskell, 213 Ill.App.3d 196 (4<sup>th</sup> Dist. 1991) and People v. Fonza, 217 Ill.App.3d 883, 892 (1st Dist. 1991).

STATE OF ILLINOIS)  
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COUNTY OF COOK) SS.

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS )  
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vs ) Case No. \_\_\_\_\_  
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**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. On March 23, 2016 The Honorable Judge Thaddeus Wilson, in the case of The People of The State of Illinois v. Joshua Perez, 14CR-12117, made an adverse credibility finding regarding the testimony of Chicago Police Officer Sgt. Corey Petracco, Star# 2545.
2. That Officer Petracco is listed as a witness for the prosecution in the above-captioned case.
3. A copy of Judge Wilson's March 23, 2016 finding is attached to this Notice.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

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Assistant State's Attorney

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Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Officer Edward Kropp, Star# 15874

Date: September 19, 2016

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous, Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Officer Edward Kropp, Star# 15874, 8<sup>th</sup> District, has been charged with Aggravated Assault under Case No. 155004097. Our office is the prosecuting authority in Officer Kropp's case. The case is currently pending in Room 207 in Bridgeview and is next up on October 25, 2016. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Kropp as a witness, the fact that Officer Kropp has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Kropp is a

witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Kropp is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Kropp is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Kropp is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)  
COUNTY OF COOK)

SS.

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS           )  
                                                               )  
                vs                                         )  
                                                               )  
                /                                         )

Case No. \_\_\_\_\_

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Edward Kropp, Star #15874, has been charged with Aggravated Assault. That case is next up on October 25, 2016 in Room 207 in Bridgeview.
2. That Officer Kropp will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Kropp regarding her pending case in return for her testimony in the above-captioned case.
4. That no threats have been made to Officer Kropp regarding her pending case in return for her testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney



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Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Former Illinois State Police Lab Analyst Nicholas Homa

Date: October 7, 2016

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous, Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that former Illinois State Police Lab Analyst Nicholas Homa has been charged with the felony of theft of services, Case No 16SL-CR06746. The case is currently pending the Circuit Court of St. Louis County, Missouri and is next up on October 17, 2016. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Mr. Homa as a witness, the fact that he has a pending case must be disclosed to the defense prior to trial. All ASAs will have to review their cases to determine whether Mr. Homa is a witness on any pending

cases.

If you or the assistants that you supervise have a case where Mr. Homa is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Mr. Homa is testifying his case is still pending, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

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COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY

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**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Nicholas Homa has been charged with the felony of theft of services in Case No. 16SL-CR06746. That case is currently pending in the Circuit Court of St. Louis County, Missouri.
2. That Nicholas Homa will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Nicholas Homa regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Nicholas Homa regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

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Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Officer Michele Molina, Star# 15021, 15<sup>th</sup> District

Date: October 12, 2016

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous, Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Officer Michelle Molina, Star# 15021, 15<sup>th</sup> District has been charged with DUI under Case No. 39208567. Our office is the prosecuting authority in Officer Molina's case. The case is currently pending in Room 408 at Traffic Court in Chicago and is next up on November 4, 2016. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Molina as a witness, the fact that Officer Molina has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Molina is a witness on any pending felony cases. Once I have the results of that search, I will forward them to

each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Molina is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Molina is a witness and you determine that she is a necessary witness and needs to be called in the case, and, at the time that Officer Molina is testifying her case is still pending, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to tender the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

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COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY

PEOPLE OF THE STATE OF ILLINOIS )

VS

Case No. \_\_\_\_\_

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**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Michele Molina, Star #15021, has been charged with DUI. That case is next up on November 4, 2016 in Room 408 at Traffic Court, in Chicago.
2. That Officer Molina will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Molina regarding her pending case in return for her testimony in the above-captioned case.
4. That no threats have been made to Officer Molina regarding her pending case in return for her testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney



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Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Officer Kendall Weaver, Star# 19526, 9<sup>th</sup> District

Date: October 12, 2016

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous, Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Officer Kendall Weaver, Star# 19526, 9<sup>th</sup> District has been charged with Domestic Battery under Case No. 16DV-76537. Our office is the prosecuting authority in Officer Weaver's case. The case is currently pending in Branch 63 at 555 West Harrison in Chicago and is next up on November 16, 2016. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Weaver as a witness, the fact that Officer Weaver has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer

Weaver is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Weaver is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Weaver is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Weaver is testifying his case is still pending, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to tender the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

SS.

COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY

PEOPLE OF THE STATE OF ILLINOIS

VS

Case No. \_\_\_\_\_

/

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Kendall Weaver, Star #19526, has been charged with Domestic Battery. That case is next up on November 16, 2016 in Branch 63 at 555 West Harrison, in Chicago.
2. That Officer Weaver will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Weaver regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Weaver regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

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Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Country Club Hills Police Officer Juan Avila

Date: October 19, 2016

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous, Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Country Club Hills Police Officer Juan Avila has been charged with Domestic Battery under Case No. 16DV-62117. Our office is the prosecuting authority in Officer Avila's case. The case is currently pending at 555 West Harrison in Chicago and is next up on November 7, 2016. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Avila as a witness, the fact that Officer Avila has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Avila is a witness on any pending felony cases. Once I have the results of that search, I will forward them to

each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Avila is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Avila is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Avila is testifying his case is still pending, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to tender the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

SS.

COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS

VS

Case No. \_\_\_\_\_

**NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Country Club Hills Police Officer Juan Avila, has been charged with Domestic Battery. That case is next up on November 7, 2016 at 555 West Harrison, in Chicago.
2. That Officer Avila will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Avila regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Avila regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney



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Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Dixmoor Police Officer Darryl Torry

Date: October 24, 2016

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous, Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Dixmoor Police Officer Darryl Torry has been charged with Domestic Battery under Case No. 16DV-77875. Our office is the prosecuting authority in Officer Torry's case. The case is currently pending in Branch 64 at 555 West Harrison in Chicago and is next up on November 7, 2016. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Torry as a witness, the fact that Officer Torry has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Torry is a witness on any pending felony cases. Once I have the results of that search, I will forward them to

each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Torry is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Torry is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Torry is testifying his case is still pending, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to tender the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

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SS.

COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY

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## NOTICE OF DISCLOSURE TO THE DEFENDANT

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Dixmoor Police Officer Darryl Torry has been charged with Domestic Battery under Case No. 16DV-77875. That case is next up on November 7, 2016 in Branch 64 at 555 West Harrison, in Chicago.
2. That Officer Torry will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Torry regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Torry regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

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Assistant State's Attorney



OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Potential Giglio material regarding Chicago Police Officers Scott Korhonen, Star# 2826 and Gerald Lodwich, Star# 6958.

Date: October 28, 2016

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrsoe, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous, Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

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On January 16, 2008, The Honorable Judge James F. Holderman, in the case of Coffie v. Korhonen and Lodwich, 05 C 6745, 2008 U.S. Dist. LEXIS 3286 (N.D. Ill. 2008) made an adverse credibility finding regarding the testimony of Chicago Police Officers Scott Korhonen, Star# 2826 and Gerald Lodwich, Star # 6958. A copy of Judge Holderman's findings is attached to this memo.

Pursuant to Brady v. Maryland, 373 US 83 (1963), the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. Giglio v. United States, 405 U.S. 150, 154 (1972). Judge Holderman's finding regarding Officers Korhonen's and Lodwich's

testimony could potentially be found to be the type of information required to be disclosed under Giglio.

Given this possibility, if you or any of the assistants that you supervise have a case where Officer Korhonen or Officer Lodwich is listed as a potential witness on our answer to discovery, Judge Holderman's finding is to be disclosed to the defense prior to trial. The MIS Department is doing a computer search to determine whether either officer is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS and have another list run. In addition, MIS has been instructed to flag Officers Korhonen's and Lodwich's names in CRIMES in order to alert ASAs that a notice of disclosure is required in the case. Units that do not have a computer case management system will have to check their files to determine whether either officer is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Korhonen or Officer Lodwich is listed as a witness and they are intending to call him as a witness at trial, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your knowledge. An electronic copy of the notice will be sent to you.

Also please remind your ASAs that the mere fact that this possible Giglio material is discoverable and has been tendered to the defense does not in and of itself mean that the defense can introduce the evidence at trial or cross-examine the officers regarding the material. The ASAs should, in the appropriate cases, file all necessary motions to seek a judicial determination as to whether this information is Giglio material and, if so, whether the material is relevant and admissible at any trial or hearing where either officer is going to be called as a witness.

In general, the case law in this area is, of course, set out in United States v. Brady, 373 U.S. 83 (1963) and Giglio v. United States, 405 U.S. 150 (1972). The timing of disclosure is governed by Weatherford v. Bursey, 429 U.S. 545 (1997). What needs to be disclosed is discussed in United States v. Agurs, 427 U.S. 97 (1976); United States v. Diaz, 922 F.2d (2<sup>nd</sup> Cir. 1990); United States v. Veras, 51 F.3d 1365 (7<sup>th</sup> Cir. 1995) and United States v. Kiszewski, 877 F.2d 210 (2<sup>nd</sup> Cir. 1989). Limiting the use of this type of information is discussed in Illinois Rule of Evidence 608 as well as in People v. Driskell, 213 Ill.App.3d 196 (4<sup>th</sup> Dist. 1991) and People v. Fonza, 217 Ill.App.3d 883, 892 (1st Dist. 1991).

STATE OF ILLINOIS)  
COUNTY OF COOK)

SS.

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS )  
 )  
 vs )  
 )  
 / )

Case No. \_\_\_\_\_

## **NOTICE OF DISCLOSURE TO THE DEFENDANT**

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. On January 16, 2008 The Honorable Judge James F. Holderman, in the case of Coffie v. Korhonen and Lodwich, 05 C 6745, 2008 U.S. Dist. LEXIS 3286 (N.D. Ill. 2008), made an adverse credibility finding regarding the testimony of Chicago Police Officer Scott Korhonen, Star# 2826////////Gerald Lodwich, Star# 6958.
2. That Officer Korhonen////Lodwich is listed as a witness for the prosecution in the above-captioned case.
3. A copy of Judge Holderman's January 16, 2008 finding is attached to this Notice.

Respectfully submitted,

Anita Alvarez  
State's Attorney of Cook County

By:

Assistant State's Attorney

Assistant State's Attorney





**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

ANITA ALVAREZ  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Country Club Hills Police Officer Juan Avila

Date: November 21, 2016

Cc: Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous, Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

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Please be advised that Country Club Hills Police Officer Juan Avila's case, 16 DV 62117, has been dismissed. Thank you.



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

KIMBERLY M. FOXX  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Sgt. Joseph Keeter, Star# 2647, 1<sup>st</sup> District

Date: December 8, 2016

Cc: Eric H. Sussman, First Assistant

Walt Hehner, Chief Deputy

Jennifer M. Ballard, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous, Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

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It has been brought to the office's attention that Chicago Police Sgt. Joseph Keeter, Star# 2647, 1<sup>st</sup> District has been charged with D.U.I. under Case No. TH 508905. Our office is the prosecuting authority in Officer Keeter's case. The case is currently pending in Traffic Court at the Daley Center and is next up on December 28, 2016. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Keeter as a witness, the fact that Officer Keeter has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Keeter is a witness on any pending felony cases. Once I have the results of that search, I will forward them to

each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Keeter is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Keeter is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Keeter is testifying his case is still pending, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to tender the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINOIS)

SS.

COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY

PEOPLE OF THE STATE OF ILLINOIS )

VS

Case No.

/

## NOTICE OF DISCLOSURE TO THE DEFENDANT

Now come the People of the State of Illinois by their attorney Kimberly M. Foxx, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

1. That Chicago Police Officer Joseph Keeter, Star # 2647, has been charged with D.U.I. That case is next up on December 28, 2016 in Traffic Court at the Daley Center
2. That Officer Keeter will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Keeter regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Keeter regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Kimberly M. Foxx  
State's Attorney of Cook County

By:

Assistant State's Attorney

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Assistant State's Attorney



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

**KIMBERLY M. FOXX  
STATE'S ATTORNEY**

**CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608**

**To:** All Supervisors, Criminal Prosecutions Bureau

**From:** Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

**Re:** Chicago Police Officer Ronald Coleman, Star #5922, Unit 189

**Date:** December 22, 2016.

**Cc:** Eric Sussman, First Assistant

Walt Hehner, Chief Deputy

Jennifer Ballard Croft, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Michael Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous, Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

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Chicago Police Officer Ronald Coleman, Star# 5922, Unit 189 has been charged federally with offenses arising out of a federal narcotics investigation. His name should be stricken from any answer to discovery on which it appears. MIS is conducting a search of CRIMES to determine whether Officer Coleman is a witness on any pending felony cases. Once I have the results of that search, I will forward the results to you. If your unit does not have a computer case management system, please have your ASAs check their files and see whether they have any cases on their call where Officer Coleman is a witness on a pending case. If he is a witness on the case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Coleman's testimony you should proceed on the case.

If you have a case where we cannot proceed without Officer Coleman's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Coleman's cases they have and how many of those cases were dismissed.

If you or your ASAs have any questions, please call me. Thank you.



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

KIMBERLY M. FOXX  
STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Officers: Verlisher Syas, Star #19154, Unit 189  
Raphael Mitchem, Star #6195, Unit 189  
Craig Dunderdale, Star #7159, Unit 189  
John Driver, Star #7916, Unit 189

Date: January 26, 2017

Cc: Eric Sussman, First Assistant

April Perry, Chief Deputy

Jennifer Ballard Croft, Chief of Staff

Steven A. Block, Chief, Special Prosecutions Bureau

Jennifer Coleman, Chief, Narcotics Prosecution Bureau

Donald Pechous, Chief, Civil Actions Bureau

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Joan Pernecke, Chief, Child Protection Division

David Weiner, Chief, Juvenile Justice Division

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Please contact me if you or any of the Assistant State's Attorneys that you supervise have any cases where Chicago Police Officers Verlisher Syas, Star #19154, Unit 189, Raphael Mitchem, Star #6195, Unit 189, Craig Dunderdale, Star #7159, Unit 189, or John Driver, Star #7916, Unit 189 is a witness on any pending cases. MIS is conducting a search of CRIMES to determine whether any of these officers are witnesses on any pending felony cases. Once I have the results of that search, I will



forward the results to you. If your unit does not have a computer case management system, please have your ASAs check their files and see whether they have any cases on their call where any of these officers are witnesses on a pending case.

If you or your ASAs have any questions, please call me. Thank you.



**OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS**

**KIMBERLY M. FOXX  
STATE'S ATTORNEY**

**CRIMINAL PROSECUTIONS BUREAU  
2650 SOUTH CALIFORNIA AVE.  
CHICAGO, ILLINOIS 60608**

To: All Supervisors, Criminal Prosecutions Bureau

From: Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re: Chicago Police Sgt. Gayle Diggs Star #2597, Unit 189

Date: January 27, 2017

Cc: Eric Sussman, First Assistant

April Perry, Chief Deputy

Jennifer Ballard Croft, Chief of Staff

Steven A. Block, Chief, Special Prosecutions Bureau

Jennifer Coleman, Chief, Narcotics Prosecution Bureau

Donald Pechous, Chief, Civil Actions Bureau

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Joan Pernecke, Chief, Child Protection Division

David Weiner, Chief, Juvenile Justice Division

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Please contact me if you or any of the Assistant State's Attorneys that you supervise have any cases where Chicago Police Sgt. Gayle Diggs, Star# 2597, Unit 189 is a witness on any pending cases. MIS is conducting a search of CRIMES to determine whether Sgt. Diggs is a witness on any pending felony cases. Once I have the results of that search, I will forward the results to you. If your unit does not have a computer case management system, please have your ASAs check their files and see whether they have any cases on their call where Sgt. Diggs is a witness on a pending case.

If you or your ASAs have any questions, please call me. Thank you.